xpires 05-31-98							
S EPA Env		nited States		☐ Registr	ation		OPP Identifier Number
EFA Env	ironment	al Protect	tion Agenc	y 🗌 Amend	ment		
	Washi	ngton, DC 2	.0460	Other:	Notification		
				esticide - Sectio			
1. Company/Product Number				Product Manager		3	Proposed Classification
70506-4 4. Company/Product (Name)			Meridi PM#	th Fry		— г	None Restricted
Permethrin Technical			Acting	PM 4		-	
5. Name and Address of Applicant (II	nclude ZIP C	ode)			n accordance	with F	TFRA Section 3(c)(3)
United Phosphorus, Inc.			(b)(l),	my product is simil	ar or identica	l in cor	mposition and labeling
630 Freedom Business Cent	er, Suite	402	to:				
King of Prussia, PA 19406			EPA F	Reg. No			
Check if this is a new ac	ldress		Produ	ct Name			
			· ·	on - II			
Amendment – Explain below.				Final printed la	bels in response	to Agen	ncy letter dated 9/7/2012
Resubmission in response to A	gency letter	dated		"Me Too" Applic			<u> </u>
Notification - Explain below.				Other - Explain	below		
Explanation: Use additional	page(s) if	fnecessar	y. (For Sect	ion I and Section I	l.)		
Submission per EPA's request of	of 6/10/201	6 to correct	broadcast use	2 .			
			Section	on - III			
Material This Product Will Be Pace	ckaged In:						
Child-Resistant Packaging	Unit Pad			Water Soluble Pac	kaging	2	2. Type of Container
∐ Yes*	∐ Ye			☐ Yes			Metal
⊠ No	If "Yes")	No. per	No If "Yes"	No. per	_	∑ Plastic
*Certification must		ckaging wgt.	container	Package wgt.	container	l l	Glass
be submitted							Paper
Location of Net Contents Information	tion	4 Size(s	s) Retail Contai	ner	5. Location	of Lahe	Other (Specify)
Label Conta		4. 0120(0	o) rectail contai	1101	On Lat		J. Directions
	ao.	Bulk					companying product
Manner in Which Label is Affixed	to Product		ograph	Other	· —		
			er glued nciled				
			Section	on - IV	-		
Contact Point (Complete items die	rectly below	for identificati	ion of individua	I to be contacted, if nec	essary, to proces	ss this a	pplication)
Name		Т	itle	A.CC : 1.C			hone No. (Include Area
Sherry Hutcheson			Regulatory	y Affairs Manager		Code)	229-247-9041
		Certifica					6. Date Application
I certify that the statements I have macknowledge that any knowingly fals							Received (Stamped)
under applicable law.	oc or misicae	anig statemen	it may be pume	mable by fine of imprise	on bour		(Stampeu)
2. Signature			3. Title				
Sherry B. Hutche	son		Regulatory	y Affairs Manager			
Typed Name Sherry Hutcheson			5. Date 06/15/2016				
		1				1	

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xpires 05-31-98					
EPA Enviro	United Sta		⊠ Registra V □ Amendr		OPP Identifier Number
	Washington, D	•	U Other:	iioiit	
	Appli	cation for Pe	esticide - Section	ı l	
1. Company/Product Number			Product Manager		Proposed Classification
70506-4 4. Company/Product (Name)		Laura PM#	Bacon		None Restricted
Permethrin Technical		Acting	PM 4		Trong Trocking
5. Name and Address of Applicant (Inclu United Phosphorus, Inc. 630 Freedom Business Center, King of Prussia, PA 19406		(b)(l), i to:	6. Expedited Review . In accordance with FIFRA Section 3(c)(3) (b)(I), my product is similar or identical in composition and labeling		
Check if this is a new addre	ess	Produc	ct Name		
		Section	on - II		
Notification - Explain below.	Resubmission in response to Agency letter dated "Me Too" Application				
Explanation: Use additional parameters of alternate CSF and p		• ,			ing site
Submission of atternate CSF and p	reminary unary	Section	* *	atte manaratetar	ing site.
Material This Product Will Be Package	ged In:				
Child-Resistant Packaging Yes* No	Unit Packaging Yes No If "Yes"	No. per	Water Soluble Paci Yes No If "Yes"	kaging No. per	2. Type of Container Metal Plastic
*Certification must be submitted	Unit Packaging w		Package wgt.	container	Glass Paper Other (Specify)
3. Location of Net Contents Information Label Containe		ze(s) Retail Contaiı	ner	On Labe	
6. Manner in Which Label is Affixed to		_ithograph	Other	On labe	ling accompanying product
o. Mariner in Whier Easter to Allixed to	⊠ F	Paper glued Stenciled			
	Section - IV				
Contact Point (Complete items direct	ly below for identifi		to be contacted, if nece	essary, to process	
Name Sherry B. Hutcheson Title Sr. Regulatory Mana			tory Manager		Telephone No. (Include Area Code)229-247-9041
I certify that the statements I have made on this form and all attachments thereto are true, accurate and complete. I Received				6. Date Application Received (Stamped)	
2. Signature Sherry B. Hutche	son	3. Title Sr. Regula	tory Manager		
4. Typed Name Sherry B. Hutcheson		5. Date December 28	3, 2016		

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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comments regarding burden estimate or any other aspect of this collection of information, inclustrategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avento this address.				
Certification with Respect to C	Citation of Data			
Applicant's/Registrant's Name, Address, and Telephone Number UPI, 630 Freedom Business Center, Suite 402, King of Prussia, PA 19406, 229-24	7-9041	EPA Registration Number/File Symbol 70506-4		
Active Ingredient(s) and/or representative test compound(s) Permethrin		Date 12/28/2016		
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) food, non-food, terrestrial,		Product Name PermethrinTechnical		
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to		
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should		
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)		
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose). I am using the selective method of support (or cite-all option under the selective method), and have included with this for completed list of data requirements (the Data Matrix form nused).				
SECTION II: GENERAL O	OFFER TO PAY			
[Required if using the cite-all method or when using the cite-all option under the select I hereby offer and agree to pay compensation, to other persons, with regard to	,	, ,		
SECTION III: CERTI	FICATION			
I certify that this application for registration, this form for reregistration, or this Data-Call-In response is supported by all data submitted or cited in the application for registration, the form for reregistration, or the Data-Call-In response. In addition, if the cite-all option or cite-all option under the selective method is indicated in Section I, this application is supported by all data in the Agency's files that (1) concern the properties or effects of this product or an identical or substantially similar product, or one or more of the ingredients in this product; and (2) is a type of data that would be required to be submitted under the data requirements in effect on the date of approval of this application if the application sought the initial registration of a product of identical or similar composition and uses .				
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained		
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.				
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.				
I certify that the statements I have made on this form and all attachments knowingly false or misleading statement may be punishable by fine or imprison				
Signature Sherry B. Hutcheson	Date 12/28/2016	Typed or Printed Name and Title Sherry B. Hutcheson, Sr. Regulatory Manager		

10/31/2016 Pay.gov - Receipt

Commercial/financial information may be entitled to confidential treatment



Receipt

Your payment is submitted

Pay.gov Tracking ID: 25UO7DAK Agency Tracking ID: 75120269506

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)
Payment Amount: \$13,226.00

Transaction Date: 10/31/2016 02:35:53 PM EDT

Payment Date: 11/01/2016 Registration Number: 70506-4

Company Name: United Phosphorus, Inc.

Company Number: 70506

Action Code: R351

Account Information

Account Holder Name: United Phosphorus, Inc.

Routing Number: ********2762

Email Confirmation Receipt

Confirmation Receipts have been emailed to:

sherry.hutcheson@uniphos.com wes.daughtry@uniphos.com





Sherry B. Hutcheson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Phone: (229) 247-9041

June 15, 2016

Document Processing Desk Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Attn: Meridith Fry (Acting PM 4)

Subject: Permethrin Technical (EPA Reg. No. 70506-4) Notification

Dear Dr. Fry,

Per your email dated June 10, 2016, United Phosphorus, Inc. (UPI) is submitting a notification for our product, Permethrin Technical (EPA Reg. No. 70506-4) to correct the statement regarding broadcast ues.

Included with this letter are the following:

- Application form, EPA Form 8570-1
- One copy of the label, marked for changes
- One copy of the label, clean

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry B. Hutcheson

Regulatory Affairs Manager

Sherry B. Hutcheson



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Date: December 28, 2016 Applicant's/Registrant's Name and Address: United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550	Product identity, composition	44841201	UPI	Own	
830.1600	Description of materials Used to Produce the Product	44841201	UPI	Own	
830.1620	Production Process	44841201	UPI	Own	
830.1670	Discussion of Formation of Impurities	44841201	UPI	Own	
830.1700	Preliminary Analysis	44841201 and	UPI	Own	
	·	50127101			
830.1750	Certification of Limits	44841201	UPI	Own	
830.1800	Analytical Method	44841201	UPI	Own	
830.6302	Color	44841202	UPI	Own	
830.6303	Physical state	44841202	UPI	Own	
830.6304	Odor	44841201	UPI	Own	
830.6313	Stability	44841202	UPI	Own	
830.6314	Oxidizing/Reducing action	44841202	UPI	Own	
830.6315	Flammability	44841202	UPI	Own	
830.6316	Explodability	44841202	UPI	Own	
830.6317	Storage Stability	48881501	UPI	Own	
830.6319	Miscibility	44841202	UPI	Own	
830.6320	Corrosion Characteristics	48881501	UPI	Own	
830.6321	Dielectric Breakdown Voltage			Not	Product is not used around
	_			required	electrical equipment.
830.7000	pH	44841202	UPI	Own	
830.7050	UV/Vis	44841202	UPI	Own	

Signature <	0	1/ + /		Name and Title	Date
Sheri	40.	Nutcheson		Sherry Hutcheson, Sr. Regulatory Manager	12/28/2016
ED A E 0570 25 (0.0	4 51	. 10	•		4 111 C

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Date: December 28, 2016 Applicant's/Registrant's Name and Address: United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	44841202	UPI	Own	
830.7200	Melting Point			Not Required	Product is a liquid.
830.7220	Boiling Point/Range	44841202	UPI	Own	
830.7300	Density, bulk density, specific gravity	44841202	UPI	Own	
830.7370	Dissociation Constant in water			Not required	No significant acidic or basic moieties
830.7550/7570	Octanol/water Partition coefficient	44841202	UPI	Own	
830.7840/7860	Water Solubility	44841202	UPI	Own	
830.7950	Vapor Pressure	44841202	UPI	Own	
870.1100	Acute oral toxicity	242899	FMC	Own	
870.1200	Acute dermal toxicity – rat	242899	FMC	Own	
870.1300	Acute inhalation toxicity – rat	41031103	Amvac	OLD	
870.2400	Eye irritation	242899	FMC	Own	
870.2500	Skin irritation	242899	FMC	Own	
870.2600	Skin sensitization			Not required	RED does not require
GENERIC					
875.1400	Inhalation exposure – indoor		Permethrin Data Group II		Task Force
860.1380	Storage Stability Data		PDGII		Task Force
860.1500	Crop field trials (CABBAGE)		PDGII		Task Force
860.1500	Crop field trials (COLLARDS)		PDGII		Task Force
860.1500	Crop field trials (GRASS, FORAGE)		PDGII		Task Force
860.1500	Crop field trials (LETTUCE, LEAF)		PDGII		Task Force

Signature Shann B	Aleta ha a a a	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016 —
Shorte U.	YIUCHUSON	Sherry Trutcheson, Sr. Regulatory Manager	12/20/2010

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING						
	PERMETHRIN					
Date: December 28, 2016		EPA Reg No./ File Symbol: 70506-4	Page 3 of 3			
Applicant's/Registrant's Name and Address:	United Phosphorus, Inc.	Product: Permethrin Technical				
	630 Freedom Business Center, Suite 402					
	King of Prussia, PA 19406					
Ingredient: Permethrin						

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
960 1500	Con California (DEACH)		DDCII		Т1. Г
860.1500	Crop field trials (PEACH)		PDGII		Task Force
860.1500	Crop field trials (PEAR)		PDGII		Task Force
860.1500	Crop field trials (TOMATO)		PDGII		Task Force
870.6300	Developmental neurotoxicity study		PDGII		Task Force
SS850.1000	Chronic freshwater sediment testing		PDGII		Task Force
SS850.1000	Chronic estuarine/marine sediment testing		PDGII		Task Force

Signature	81 01/11	Name and Title	Date
	Sherry B. Hutcheson	Sherry Hutcheson, Sr. Regulatory Manager	12/28/2016

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: December 28, 2016 EPA Reg No./ File Symbol: 70506-4 Page 1 of 3 Applicant's/Registrant's Name and Address: Product: Permethrin Technical United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550	Product identity, composition	44841201	UPI	Own	
830.1600				Own	
830.1620				Own	
830.1670				Own	
830.1700				Own	
830.1750				Own	
830.1800				Own	
830.6302				Own	
830.6303				Own	
830.6304				Own	
830.6313				Own	
830.6314				Own	
830.6315				Own	
830.6316				Own	
830.6317				Own	
830.6319				Own	
830.6320				Own	
830.6321				Not	Product is not used around
				required	electrical equipment.
830.7000				Own	
830.7050				Own	

Signature Sherry B. Hutcheson	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: December 28, 2016 EPA Reg No./ File Symbol: 70506-4 Page 2 of 3 Applicant's/Registrant's Name and Address: Product: Permethrin Technical United Phosphorus, Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	44841202	UPI	Own	
830.7200				Not	Product is a liquid.
				Required	
830.7220				Own	
830.7300				Own	
830.7370				Not	No significant acidic or basic
				required	moieties
830.7550/7570				Own	
830.7840/7860				Own	
830.7950				Own	
870.1100				Own	
870.1200				Own	
870.1300				OLD	
870.2400				Own	
870.2500				Own	
870.2600				Not	RED does not require
				required	
GENERIC					
875.1400				roup II	Task Force
860.1380					Task Force
860.1500					Task Force
860.1500					Task Force
860.1500					Task Force
860.1500					Task Force

Signature Sherry B. Hitcheson	Name and Title Sherry Hutcheson, Sr. Regulatory Manager	Date 12/28/2016
EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version		Public Coby



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8 37						
DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING						
PERMETHRIN						
Date: December 28, 2016		EPA Reg No./ File Symbol: 70506-4	Page 3 of 3			
,		,				
Applicant's/Registrant's Name and Address:	United Phosphorus, Inc.	Product: Permethrin Technical				
	630 Freedom Business Center, Suite 402					
	King of Prussia, PA 19406					
Ingredient: Permethrin						
1 =						

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Crop field trials (PEACH)		PDGII		Task Force
860.1500					Task Force
860.1500					Task Force
870.6300					Task Force
SS850.1000					Task Force
SS850.1000	Chronic estuarine/marine sediment testing		PDGII		Task Force

Signature Shann B Hutchanger	Name and Title	Date
Sherry D. Gracheson	Sherry Hutcheson, Sr. Regulatory Manager	12/28/2016

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Sherry B. Hutcheson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

Phone: (229) 247-9041

December 28, 2016 MRID 50127100

Document Processing Desk Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Attn: Laura Bacon (PM 4)

Subject: Permethrin Technical alternate manufacturing location (EPA Reg. No.

70506-4)

Dear Ms. Bacon,

United Phosphorus, Inc. is submitting an application for an alternate manufacturing site of our Pemethrin technical (EPA Reg. No. 70506-4) under R351.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- copy of payment for R351
- two copies of the alternate CSF,
- one copy of the basic CSF on file,
- one copy of the study as indicated below.

MRID No.	Guideline No.	Study No.	Study Title
50127101	830.1700 830.1800	11639	(2016) Hutcheson, S. Permethrin Technical: Preliminary Analysis of Five Analysis, pp. 475.

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry B. Hutcheson

Sr. Regulatory Manager

Sherry B. Hutcheson

Aprico 00-01-00					
	ited States		☐ Registra	tion	OPP Identifier Number
EPA Environmenta	I Protection	n Agency	☐ Amendm	ent	
Washin	gton, DC 2046	60	Other: F	PL	
	Application	n for Pest	ticide - Section	1	
Company/Product Number			oduct Manager		Proposed Classification
70506-4		Michael \	Nagman		
Company/Product (Name) Permethrin Technical		PM# Acting PI	M A		None Restricted
Name and Address of Applicant (Include ZIP Co	de)			accordance	with FIFRA Section 3(c)(3)
United Phosphorus, Inc.	ŕ				in composition and labeling
630 Freedom Business Center, Suite 4	02	to:			
King of Prussia, PA 19406		EPA Reg	j. No		
		Product I	Name		
Check if this is a new address		1 TOGGOTT	vario		
		Section	ı - II		
Amendment – Explain below.			Final printed labe	els in response t	o Agency letter dated 9/18/17
Resubmission in response to Agency letter de	ated		Me Too" Applica	tion	
Notification - Explain below.			Other - Explain b		
Explanation: Use additional page(s) if necessary. (For Section I and Section II.)					
		Section	- III		
Material This Product Will Be Packaged In: Child Paciety Packaging Unit Pack List Pack Lis	raging		Water Calubia Deals	oging	Type of Container
Child-Resistant Packaging Unit Pack Yes* Yes			Water Soluble Pack	aging	2. Type of Container Metal
No No	,		No No		Plastic
If "Yes"		o. per	If "Yes"	No. per	Glass
*Certification must Unit Pack	aging wgt. co	ontainer	Package wgt.	container	Paper
be submitted					Other (Specify)
3. Location of Net Contents Information	4. Size(s) R	etail Container			of Label Directions
Label Container	bulk			☐ On Lab	
Manner in Which Label is Affixed to Product	Lithogra	anh	Other		ling accompanying product
o. Mainer in William Easer is Attixed to 1 loadst	Paper g	lued			
	Stencile	Section	_ IV		
Contact Point (Complete items directly below for	or identification			ssary to proces	s this application)
Name	Title		So somasica, ii nece	loary, to proces	Telephone No. (Include Area
Sherry B. Hutcheson		r. Regulato	ry Manager		Code)229-247-9041
Locatify that the atotomoute I have made as this for	n	o oro truo	nd complete !	6. Date Application	
I certify that the statements I have made on this for acknowledge that any knowingly false or misleading				Received (Stamped)	
under applicable law.	<u> </u>	, ,	,		(Otampou)
2. Signature		3. Title Sr. Regulatory Manager			
S/ // //	5	ı. Regulatol	y ivianager		
Sherry Hitcheson 4. Typed Name					
4. Typed Name // Sherry B. Hutcheson	_	5. Date September 28, 2017			

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy

xpires 05-31-98						
S EPA Env	United S		☐ Registra		OPP Identifier Number	
Env	ironmental Pro	•	_			
	Washington, I					
	Арр		esticide - Sectio	n I		
1. Company/Product Number 70506-4		2. EPA B. Fer	Product Manager		Proposed Classification	
4. Company/Product (Name)		PM#	1011		None Restricted	
Permethrin Technical		PM 4				
5. Name and Address of Applicant (Ir United Phosphorus, Inc.				with FIFRA Section 3(c)(3) in composition and labeling		
630 Freedom Business Center, Suite 402			iny product is simil	ai oi identicai	in composition and labeling	
King of Prussia, PA 19406		EPA F	Reg. No			
		Drodu	ot Nama			
Check if this is a new ac	Idress	Flodu	ct Name			
		Secti	on - II			
Amendment – Explain below.			Final printed lal	oels in response t	o Agency letter dated	
Resubmission in response to Agency letter dated			Me Too" Applic			
Notification - Explain below.	(a) if		Other - Explain			
Explanation : Use additional	Explanation: Use additional page(s) if necessary. (For Section I and Section II.)					
Notification of corrected address	s on CSF.					
		Section	on - III			
Material This Product Will Be Pac Child-Resistant Packaging	ckaged In: Unit Packaging		Water Soluble Pac	kaging	Type of Container	
Yes*	Yes		Yes Yes	kagirig	Metal	
⊠ No	⊠ No		⊠ No		Plastic	
	If "Yes" Unit Packaging	No. per wgt. container	If "Yes" Package wgt.	No. per container	Glass	
*Certification must	Office ackaging	wgt. container	r ackage wgt.	container	Paper	
be submitted 3. Location of Net Contents Informa	tion 4. S	Size(s) Retail Contai	ner	5. Location	Other (Specify) of Label Directions	
∑ Label ☐ Conta	ainer	3.23(0) 1 totali 00 iliai		el		
	bulk			On labe	ling accompanying product	
Manner in Which Label is Affixed	_	Lithograph Paper glued	Other			
		Stenciled				
		Section	on - IV			
Contact Point (Complete items direct)	rectly below for ident	ification of individua	I to be contacted, if nec	essary, to proces		
Name Sherry B. Hutcheson		Title Sr. Pegula	atory Manager II		Telephone No. (Include Area Code)229-247-9041	
Sherry B. Hulcheson		atory ivianayer ii		,		
Certificatio I certify that the statements I have made on this form and all attac			ereto are true, accurate	and complete. I	Date Application Received	
acknowledge that any knowingly false or misleading statement may			shable by fine or impriso	nment or both	(Stamped)	
under applicable law. 2. Signature		3. Title			-	
,	4 4 14		atory Manager II			
Sherry Hutches	w					
4. Typed Name		5. Date August 13, 2	019			
Sherry B. Hutcheson			010			

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy

Please read instructions on reve	rse before completing for	m.		F	orm Ap	proved. OMB No	. 2070-0060. Approval expires 2-28-95
• En	United		on Agoney	, [Re	gistration	OPP Identifier Number
SEPA "	vironmental Washington,		on Agency	v	₫ An	nendment	
	3 ,				Ot	her	
		Application	n for Pesticide	- Section	ո I		
1. Company/Product Number	er	<i>т</i> ърпошто.		Product M	anager		3. Proposed Classification
70506-04				B.	Fertic	h	
4. Company/Product (Name UPL NA Inc./ Permet			PM#		4		☑ None ☐ Restricted
5. Name and Address of Ap		ode)					e with FIFRA Section 3(c)(3)(b)(i),
UPL NA Inc. c/o Pyxis Regulatory	Consulting Inc.		, ,	luct is simila L eg. No.	ar or ide	entical in compos	sition and labeling to:
4110 136 th St. Ct. NW				ct Name			
Gig Harbor, WA 9833	2						
			Section - II				
✓ Amendment – Explain b	pelow.			Final printe Agency let		ls in response t ed	
☐ Resubmission in respo	nse to Agency letter d	ated		'Me Too" A	Applica	tion.	
☐ Notification – Explain below.				Other – Exp	olain be	elow.	
Explanation: Use additio	nal page(s) if necessar	y. (For Section	n I and Section II.)				
Non-PRIA Fast Track la	bel amendment to a	dd approve	d food uses to the				peing submitted with this
amendment and no data PRIA fee is required. Ple							ify as a PRIA action and no
additional information.	ease contact the (<u>se</u>	<u> </u>	<u>KC.com</u> , (255)6	55-7509)	ii you	nave any qu	destions of fleed arry
			Castion III				
1. Material This Product Will	Re Packaged In:		Section - III				
Child-Resistant Packaging	Unit Packaging		Water Soluble F	ackaging		2. Type of Co	ntainer
☐ Yes	☐ Yes		☐ Yes				
□ No	□ No		□ No			☐ Metal☐ Plastic	•
□ 110						☐ Glass	
* Certification must	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container		☐ Paper	
be submitted	——————————————————————————————————————					☐ Other	(Specif <u>y)</u>
3. Location of Net Contents	Information	4. Size(s) Re	tail Container			ation of Label	Directions
☐ Label ☐ Co	ontainer						accompanying product
6. Manner in Which Label is	Affixed to Product	= =9		□ O	ther _	_	_
	L	☐ Paper glud ☐ Stenciled	ed				
		_ Otenonea	Section - IV				
1. Contact Point (Complete	items directly below fo	or identificatio	n of individual to b	e contacte	d, if ne	cessary, to pro	cess this application.)
Name			Title			Telepho	one No. (Include Area Code)
Jesse Lollis			Agent			(253) 8	53-7369
	C	ertificatio	n				6. Date Application Received
I certify that the statements							(Stamped)
I acknowledge that any know both under applicable law.	wingly false of misleadin	g statement ma	ay be punishable by	tine or impr	isonme	ent or	
2. Signature			3. Title				1
100			Agent				
June Jullis							
4. Typed Name			5. Date				
Jesse Lollis			Mar. 06, 2019)			



David L. Olson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 (610) 491-2814 dave.olson@uniphos.com

January 11, 2019

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as <u>Consultant</u> for UPL NA Inc., EPA Company Number 70506, before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law.

If you have any questions, please do not hesitate to contact me.

Sincerely,

David L. Olson

Director, Regulatory Affairs

al 2 Ham

UPL NA Inc.

Cc: Pyxis Regulatory Consulting



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
JESSE@PYXISRC.COM

March 6, 2019

ELECTRONIC SUBMISSION

Beth Fertich (PM 4)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: UPL NA Inc., Permethrin Technical (EPA Reg. No. 70506-04)

Non-PRIA, Fast Track Label Amendment Adding Approved Uses

Dear Ms. Fertich,

On behalf of UPL NA Inc., we are submitting an application to amend the registration of Permethrin Technical (EPA Reg. No. 70506-04) to add approved food uses to the label. These uses are found on several end-use product labels (EPA Reg. Nos. 70506-05, 70506-09, 70506-66). The uses being added have established tolerances for Permethrin according to CFR §180.378 and the revised crop group listings are consistent with 40 CFR §180.41. We also wish to consolidate the labeling to list the appropriate crop groups. UPL NA Inc. wants to ensure that its technical label is as comprehensive as possible.

In support of this label amendment, we are submitting the following documents:

- 1. Application for Amended Pesticide Registration (EPA Form 8570-1)
- 2. One (1) copy of Permethrin Technical Label with changes tracked
- 3. One (1) copy of Permethrin Technical Label with changes incorporated
- 4. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
- 6. Public File Copy of the Data Matrix (EPA Form 8570-35)
- 7. Letter of Authorization

UPL NA Inc. is using the cite-all method of support. As per EPA's interpretations of 40 CFR Parts 152.86(b)(2)(i) and 152.93(b)(2)(i), UPL NA Inc. submitted notices of intent to apply and offers to pay to companies on the October 1, 2018 Data Submitter's List for Permethrin. Since no data are submitted with this amendment and no data need to be reviewed to support this amendment, this action does not qualify as a PRIA action and no PRIA fee is required.

Please contact me ((253) 853-7369, Jesse@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

Jesse Lollis

Enclosures





Sherry B. Hutcheson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Phone: (229) 247-9041

September 28, 2017

Document Processing Desk (FPL) Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Attn: Michael Wagman (Acting PM 4)

Subject: Final Printed Label for Permethrin Technical (EPA Reg. No.

70506-4)

Dear Mr. Wagman,

United Phosphorus, Inc. is submitting a final printed label for our product, Permethrin Technical (EPA Reg. No. 70506-4) in accordance with the EPA stamped label dated September 18, 2017.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- a final copy of the label

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry B. Hutcheson

Sherry Hitcheson

Sr. Regulatory Manager





Sherry B. Hutcheson 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406

Phone: (229) 247-9041

August 13, 2018

Document Processing Desk Office of Pesticide Programs (7504P) U.S. Environmental Protection Agency 1200 Pennsylvania Avenue, NW Washington, DC 20460-0001

Attn: Beth Fertich (PM 4)

Subject: Notification for Permethrin Technical (EPA Reg. No. 70506-4)

Dear Ms. Fertich,

United Phosphorus, Inc. is submitting a notification for our product, Permethrin Technical (EPA Reg. No. 70506-4). The previous CSF contained a typographical error on the reporting of the address and EPA Establishment Number. That information has been corrected and is attached here to be added to the file.

In addition to this transmittal letter, we are supplying:

- an application form 8570-1,
- Replacement Basic CSF, EPA form 8570-4
- Letter from producing establishment

This notification is consistent with the provisions of PR Notice 98-10 and EPA regulations at 40 CFR 152.46, and no other changes have been made to the labeling or the confidential statement of formula of this product. I understand that it is a violation of 18 USC Sec. 1001 to willfully make any false statements to EPA. I further understand that if this notification is not consistent with the terms of PR Notice 98-10 and 40 CFR 152.46, this product may be in violation of FIFRA and I may be subject to enforcement action and penalties under sections 12 and 14 of FIFRA.

If you have any questions, please feel free to contact me at either 229-247-9041 or sherry.hutcheson@uniphos.com.

Best regards,

Sherry Hutcheson
Sherry B. Hutcheson

Sr. Regulatory Manager II



Sandra Fischer 477 Madison Ave., 15th Floor New York, NY 10022 Direct: (212) 702-5464 Fax: (212) 702-5450 sfischer@bdlaw.com

April 7, 2020

VIA FOIA ONLINE

Freedom of Information Officer U.S. Environmental Protection Agency Washington, D.C. 20460

RE: FOIA Request

Dear FOIA Officer:

Pursuant to the Freedom of Information Act, 5 U.S.C. § 552, as amended, and the FOIA regulations promulgated by the U.S. Environmental Protection Agency in 40 C.F.R. Part 2, I hereby request all electronic documents in EPA's files for the registrations below **since January** 1, 2013:

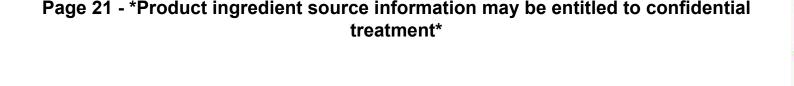
- 91813-13 (including documents under former registration number 70506-4)
- 91813-15 (including documents under former registration number 70506-10)
- 91813-27 (including documents under former registration number 70506-118)
- 91813-53 (including documents under former registration number 70506-18)

Due to EPA directives to work from home because of COVID-19, my understanding is FOIA Officers currently only have access to certain scanned files for each registration. Therefore, my request pertains to any files that can be currently accessed until normal EPA operations are restored.

Please contact me at (212) 702-5464 or via email if you have any questions or concerns. I authorize costs up to \$250 associated with copy and review time to prepare this request. Please let me know if the costs will exceed this amount.

Sincerely, s/Sandra Fischer Paralegal

Washington, D.C. Maryland New York Massachusetts New Jersey Texas California





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the complete form to this address.

to this address.					
Certification with	Respect to Cita	tion of Data			
Applicant's/Registrant's Name, Address, and Telephone Number UPL NA Inc. c/o Pyxis Regulatory Consulting, Inc. 4110 136 Gig Harbor, WA 98332 (253)853-7369	EPA Registration Number/File Symbol/ 70506-04				
Active Ingredient(s) and/or representative test compound(s) Permethrin		Date Mar. 06, 2019			
General Use Pattern(s) (list all those claimed for this product using 40 CFF TGAI	Product Name Permethrin Technical				
NOTE: If your product is a 100% repackaging of another purchased Ef submit this form. You must submit the Formulator's Exemption Statements					
I am responding to a Data-Call-In Notice, and have including should be used for this purpose).	with this form a list	of companies send offer of compensation (the Data Matrix form			
SECTION I: METHOD OF DA	ATA SUPPORT (C	neck one method only)			
I am using the cite-all method of support, and have included w form a list of companies sent offers of compensation (the Data form should be used for this purpose).		I am using the selective method of support (or cite-all option under the selective method), and have included with this form a completed list of data requirements (the Data Matrix form must be used).			
SECTION II: G	SENERAL OFFER	ГО РАҮ			
[Required if using the cite-all method or when using the cite-all option under	er the selective met	nod to satisfy one or more data requirements]			
I hereby offer and agree to pay compensation, to other persor	ns, with regard to th	e approval of this application, to the extent required by FIFRA.			
SECTION	III: CERTIFICATION	ON			
I certify that this application for registration, this form for reregistration application for registration, the form for reregistration, or the Data-Call-In reindicated in Section I, this application is supported by all data in the Agenc substantially similar product, or one or more of the ingredients in this product requirements in effect on the date of approval of this application if the application.	esponse. In addition by's files that (1) cor uct; and (2) is a type	cern the properties or effects of this product or an identical or of data that would be required to be submitted under the data			
I certify that for each exclusive use study cited in support of this obtained the written permission of the original data submitter to cite that str		gistration, that I am the original data submitter or that I have			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is re accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available evidence to the Agency upon request, I understand that the Agency may in with FIFRA.	le and will be subm	itted to the Agency upon request. Should I fail to produce such			
I certify that the statements I have made on this form and al knowingly false or misleading statement may be punishable by fine o					
Signature Julis-	Date Mar. 06, 2019	Typed or Printed Name and Title Jesse Lollis Regulatory Consultant			

EPA Form 8570-34 (12-2003) Electronic and Paper versions available. Submit only Paper version.



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: March 6, 2019 EPA Reg No./ File Symbol: 70506-4 Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin (CAS No. 52645-53-1)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC					
830.1550	Product identity, composition	44841201	UPI	Own	
830.1600	Description of materials Used to Produce the Product	44841201	UPI	Own	
830.1620	Production Process	44841201	UPI	Own	
830.1670	Discussion of Formation of Impurities	44841201	UPI	Own	
830.1700	Preliminary Analysis	44841201 and 50127101	UPI	Own	
830.1750	Certification of Limits	44841201	UPI	Own	
830.1800	Analytical Method	44841201	UPI	Own	
830.6302	Color	44841202	UPI	Own	
830.6303	Physical state	44841202	UPI	Own	
830.6304	Odor	44841201	UPI	Own	
830.6313	Stability	44841202	UPI	Own	
830.6314	Oxidizing/Reducing action	44841202	UPI	Own	
830.6315	Flammability	44841202	UPI	Own	
830.6316	Explodability	44841202	UPI	Own	
830.6317	Storage Stability	48881501	UPI	Own	
830.6319	Miscibility	44841202	UPI	Own	
830.6320	Corrosion Characteristics	48881501	UPI	Own	
830.6321	Dielectric Breakdown Voltage			Not required	Product is not used around electrical equipment.
830.7000	рН	44841202	UPI	Own	
830.7050	UV/Vis	44841202	UPI	Own	

June Julia	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
Signature		00



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for reregistration and special review activities, including time for reading the instruction and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington DC 20460. Do not send the form to this address.

DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: March 6, 2019 EPA Reg No./ File Symbol: 70506-4 Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin (CAS No. 52645-53-1)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7100	Viscosity	44841202	UPI	Own	
830.7200	Melting Point			Not	Product is a liquid.
				Required	1
830.7220	Boiling Point/Range	44841202	UPI	Own	
830.7300	Density, bulk density, specific gravity	44841202	UPI	Own	
830.7370	Dissociation Constant in water			Not	No significant acidic or basic
				required	moieties
830.7550/7570	Octanol/water Partition coefficient	44841202	UPI	Own	
830.7840/7860	Water Solubility	44841202	UPI	Own	
830.7950	Vapor Pressure	44841202	UPI	Own	
870.1100	Acute oral toxicity	242899	FMC	Own	
870.1200	Acute dermal toxicity – rat	242899	FMC	Own	
870.1300	Acute inhalation toxicity – rat	41031103	Amvac	OLD	
870.2400	Eye irritation	242899	FMC	Own	
870.2500	Skin irritation	242899	FMC	Own	
870.2600	Skin sensitization			Not required	RED does not require
				required	

	Name and Title	Date
Jusse Illi.	Jesse Lollis Regulatory Consultant	3/6/2019
Simplify		
Signature		0.4
		- 1 /



C.S. Environmental Protection Agency, 401 W Street, S.W., Washington De 20400. Do not send the form to this address.							
DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING							
	PERMETHRIN						
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 3 of 14				
		,					
Applicant's/Registrant's Name and Address:	UPL NA Inc.	Product: Permethrin Technical					
	630 Freedom Business Center, Suite 402						
King of Prussia, PA 19406							
Ingredient: Permethrin (CAS No. 52645-53-1)							

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
GENERIC DATA REQUIREM	MENTS				
UPL NA Inc. is using the cite-al	l option to satisfy Permethrin generic data				
requirements. UPL NA Inc. has	made offers-to-pay to the following companies				
on the October 1, 2018 Data Sub	mitters List for Permethrin.				
		Cite-All	Bonide Products, Inc.	PAY	
		Cite-All	Coopers Animal Health, Inc.	PAY	
		Cite-All	L. Perrigo Company	PAY	
		Cite-All	Syngenta Crop Protection, LLC.	PAY	
		Cite-All	Senoret Chemical Co., Inc.	PAY	
		Cite-All	Value Gardens Supply, LLC.	PAY	
		Cite-All	The Scotts Company	PAY	
		Cite-All	Bayer Cropscience LP	PAY	
		Cite-All	Farnam Companies, Inc.	PAY	
		Cite-All	FMC Corporation	PAY	
		Cite-All	United Industries	PAY	
			Corporation		
		Cite-All	E.I. Du Pont De Nemours and Company	PAY	
		Cite-All	Nott Products Co., Inc.	PAY	
		Cite-All	MacDermid Agricultural Soultions, Inc.	PAY	

June Julia	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
Signature		



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING							
	PERMETHRIN						
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 4 of 14				
Applicant's/Registrant's Name and Address:	UPL NA Inc.	Product: Permethrin Technical					
	630 Freedom Business Center, Suite 402						
King of Prussia, PA 19406							
Ingredient: Permethrin (CAS No. 52645-53-1)							

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Bayer Environmental Science	PAY	
		Cite-All	Realex	PAY	
		Cite-All	Chase Products Company	PAY	
		Cite-All	BASF Corporation	PAY	
		Cite-All	Univar USA, Inc.	PAY	
		Cite-All	Value Garden Supply, LLC.	PAY	
		Cite-All	Prentiss, LLC.	PAY	
		Cite-All	Claire Manufacturing Company	PAY	
		Cite-All	Intervet, Inc.	PAY	
		Cite-All	Southern Agricultural Insecticides, Inc.	PAY	
		Cite-All	Green Light Company	PAY	
		Cite-All	Lebanon Seaboard Corporation	PAY	
		Cite-All	Zoetis Inc.	PAY	
		Cite-All	McLaughlin Gormley King Company	PAY	
		Cite-All	IBC Manufacturing Company	PAY	
		Cite-All	Fuller System, Inc.	PAY	
		Cite-All	Winfield Solutions, LLC.	PAY	
	_	Cite-All	W.F. Young, Inc.	PAY	

Husse Co.	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
Signature		00



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN						
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 5 of 14			
Applicant's/Registrant's Name and Address:	Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Product: Permethrin Technical					
Ingredient: Permethrin (CAS No. 52645-53-1)						

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	NCH Corporation	PAY	
		Cite-All	PBI/Gordon Corporation	PAY	
		Cite-All	Virbac AH, Inc.	PAY	
		Cite-All	Sergeant's Pet Care	PAY	
			Products, Inc.		
		Cite-All	The Hartz Mountain	PAY	
			Corporation		
		Cite-All	Wellmark International	PAY	
		Cite-All	Happy Jack, Inc.	PAY	
		Cite-All	Miller W C Chem Company	PAY	
		Cite-All	Wilbur-Ellis Company, LLC	PAY	
		Cite-All	Lynwood Labs, Inc.	PAY	
		Cite-All	ABC Compounding Co.,	PAY	
			Inc.		
		Cite-All	Pet Chemicals	PAY	
		Cite-All	Cheminova A/S	PAY	
		Cite-All	S.C. Johnson & Son, Inc.	PAY	
		Cite-All	AMVAC Chemical	PAY	
			Corporation		
		Cite-All	Air Guard Control	PAY	
		Cite-All	Summit Chemical Company	PAY	
		Cite-All	Cessco, Inc.	PAY	
		Cite-All	IQ Products Company	PAY	

$\mathcal{A} \circ \mathcal{O}$	Name and Title	Date
Signature Julis	Jesse Lollis Regulatory Consultant	3/6/2019



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN						
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 6 of 14			
Applicant's/Registrant's Name and Address:	Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406					
Ingredient: Permethrin (CAS No. 52645-53-1)						

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Voluntary Purchasing	PAY	
			Groups, Inc.		
		Cite-All	J.J. Mauget Company	PAY	
		Cite-All	Clarke Mosquito Control	PAY	
			Products, Inc.		
		Cite-All	United Industries	PAY	
			Corporation		
		Cite-All	Safeguard Chemical	PAY	
			Corporation		
		Cite-All	Sunniland Corporation	PAY	
		Cite-All	Amrep, Inc.	PAY	
		Cite-All	N.C.P. of NW Ohio	PAY	
		Cite-All	Chemsico	PAY	
		Cite-All	Fiebing Company, Inc.	PAY	
		Cite-All	Syngenta Crop Protection	PAY	
		Cite-All	Sumitomo Chemical	PAY	
			Company, Ltd.		
		Cite-All	Contact Industries	PAY	
		Cite-All	AMREP, Inc.	PAY	
		Cite-All	Sherwin Williams	PAY	
			Diversified Brands		
		Cite-All	Sungro Chemicals, Inc.	PAY	
		Cite-All	Bayer Healthcare, LLC.	PAY	
		Cite-All	ADAMA Agan Ltd.	PAY	

	Name and Title	Date
Juse allis	Jesse Lollis Regulatory Consultant	3/6/2019
Signature		



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN					
	PERMETHRIN				
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 7 of 14		
,					
Applicant's/Registrant's Name and Address:	UPL NA Inc.	Product: Permethrin Technical	·		
	630 Freedom Business Center, Suite 402				
	·				
King of Prussia, PA 19406					
Ingredient: Permethrin (CAS No. 52645-53-1)					
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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Plaze Georgia	PAY	
		Cite-All	ADAMA Makhteshim Ltd.	PAY	
		Cite-All	Speer Products, Inc.	PAY	
		Cite-All	Gil MFG, Inc.	PAY	
		Cite-All	Rainbow Technology	PAY	
			Corporation		
		Cite-All	I2LResearch USA, Inc.	PAY	
		Cite-All	Bio-Derm Laboratories, Inc.	PAY	
		Cite-All	Sandoz Agro, Inc.	PAY	
		Cite-All	Pyranha, Inc.	PAY	
		Cite-All	Phaeton Corporation	PAY	
		Cite-All	Mitsui Chemicals, Inc.	PAY	
		Cite-All	Gharda Chemicals, Ltd.	PAY	
		Cite-All	H Wilson Manufacturing	PAY	
			Co. Inc.		
		Cite-All	WeChem, Inc.	PAY	
		Cite-All	Loveland Products, Inc.	PAY	
		Cite-All	Aerochem, Inc.	PAY	
		Cite-All	Y-Tex Corporation	PAY	
		Cite-All	Octavius Hunt, Ltd.	PAY	
		Cite-All	Lawson Products, Inc.	PAY	
		Cite-All	Zep Commercial Sales &	PAY	
			Service		
		Cite-All	Safer, Inc.	PAY	

June Julis	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
Signature		00



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING					
PERMETHRIN					
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 8 of 14		
Applicant's/Registrant's Name and Address:	UPL NA Inc.	Product: Permethrin Technical			
	630 Freedom Business Center, Suite 402				
King of Prussia, PA 19406					
Ingredient: Permethrin (CAS No. 52645-53-1)					

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Albaugh, Inc.	PAY	
		Cite-All	Weeks & Leo Co., Inc.	PAY	
		Cite-All	QuestSpecialty Corporation	PAY	
		Cite-All	CTX-Cenol, Inc.	PAY	
		Cite-All	Insecta Marketing, Inc.	PAY	
		Cite-All	Burlington Scientific Corporation	PAY	
		Cite-All	Celex, Division of United Industries Corp.	PAY	
		Cite-All	K-G Spray-Pak, Inc.	PAY	
		Cite-All	Chem-Tech, Ltd.	PAY	
		Cite-All	Palm Beach Laboratories,	PAY	
			Inc.		
		Cite-All	Coulston Products, Inc.	PAY	
		Cite-All	BASF Sparks, LLC.	PAY	
		Cite-All	LHB Industries	PAY	
		Cite-All	BASF Corporation	PAY	
		Cite-All	The Fountainhead Group, Inc.	PAY	
		Cite-All	Control Solutions, Inc.	PAY	
		Cite-All	Virbac	PAY	
		Cite-All	Arizona Chemical Group, Inc.	PAY	
		Cite-All	CRC Industries, Inc.	PAY	

	ame and Title	Date
Jess John Jess	sse Lollis Regulatory Consultant	3/6/2019
Signatura		
Signature		-



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: March 6, 2019 EPA Reg No./ File Symbol: 70506-4 Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin (CAS No. 52645-53-1)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Ecohealth, Inc.	PAY	
		Cite-All	CAR-MAC Products, Inc.	PAY	
		Cite-All	Gro Tec, Inc.	PAY	
		Cite-All	Valent U.S.A. LLC	PAY	
		Cite-All	Lineguard, Inc.	PAY	
		Cite-All	Becker Microbial Products,	PAY	
			Inc.		
		Cite-All	Management Contract	PAY	
			Services, Inc.		
		Cite-All	Nisus Corporation	PAY	
		Cite-All	Pyrethroid Working Group	PAY	
		Cite-All	Merial, Inc.	PAY	
		Cite-All	Arysta Lifescience North	PAY	
			America, LLC		
		Cite-All	SDTF	OWN	
		Cite-All	Fly Guard Systems, Inc.	PAY	
		Cite-All	Ecto Development	PAY	
			Corporation		
		Cite-All	PM Resources, Inc.	PAY	
		Cite-All	Sherwin-Williams	PAY	
			Diversified Brands		
		Cite-All	Synergy Labs	PAY	
		Cite-All	Bengal Products, Inc.	PAY	
		Cite-All	Pet Logic, LLC	PAY	

	Name and Title	Date
June Julis-	Jesse Lollis Regulatory Consultant	3/6/2019
Signature		0.4



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Babolna Bioenvironmental Centre, Ltd.	PAY	
		Cite-All	Meghmani Organics, Ltd.	PAY	
		Cite-All	Gharda USA, Inc.	PAY	
		Cite-All	Premium Environmental Products, LLC.	PAY	
		Cite-All	LG Chem, Ltd.	PAY	
		Cite-All	RIAP Chemcial Factory	PAY	
		Cite-All	Outdoor Residential Exposure Task Force	OWN	
		Cite-All	Agricultural Reentry Task Force	OWN	
		Cite-All	Thermacell Repellants, Inc.	PAY	
		Cite-All	Bayer Advanced	PAY	
		Cite-All	Plexus Services, Inc.	PAY	
		Cite-All	Manna Pro Products, LLC	PAY	
		Cite-All	Valent Biosciences LLC	PAY	
		Cite-All	Dairy Solutions, Inc.	PAY	
		Cite-All	Sapstain Industry Group (SIG)	PAY	
		Cite-All	Non-Dietary Exposure Task Force	PAY	
		Cite-All	A.N.T.S. Research & Development Corp.	PAY	

	Name and Title	Date
June Tullis-	Jesse Lollis Regulatory Consultant	3/6/2019
Signature		00



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN				
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 11 of 14	
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Product: Permethrin Technical				
Ingredient: Permethrin (CAS No. 52645-53-1)				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	IDC Company	PAY	
		Cite-All	Pro Products	PAY	
		Cite-All	Nix, Inc.	PAY	
		Cite-All	Univar Environmental	PAY	
			Services		
		Cite-All	Tagros Chemicals India	PAY	
			Private, Ltd.		
		Cite-All	Travel Medicine	PAY	
		Cite-All	FIFRA Endangered Species	PAY	
			Task Force, LLC		
		Cite-All	Koppers Performance	PAY	
			Chemicals New Zealand		
		Cite-All	Bug Stomper II, LLC.	PAY	
		Cite-All	Product & Regulatory	PAY	
			Associates, LLC.		
		Cite-All	Bio-Planet Products	PAY	
		Cite-All	Insect Shield, LLC.	PAY	
		Cite-All	Residential Exposure Joint	OWN	
			Venture		
		Cite-All	Regguide	PAY	
		Cite-All	Arch Wood Protection (NZ),	PAY	
			Ltd.		
		Cite-All	Notable Solutions, LLC	PAY	

	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
Signature		



DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN				
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 12 of 14	
Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Product: Permethrin Technical				
Ingredient: Permethrin (CAS No. 52645-53-1)				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Agricultural Handler	OWN	
			Exposure Task Force		
		Cite-All	Manna Pro Products, LLC	PAY	
		Cite-All	Nova Biogenetics, Inc.	PAY	
		Cite-All	Andrew M Martin Co., NV,	PAY	
			Inc.		
		Cite-All	Starensier, Inc.	PAY	
		Cite-All	Bikel International, Inc.	PAY	
		Cite-All	Traveler's Supply, Inc.	PAY	
		Cite-All	Eastern Chemical, LLC	PAY	
		Cite-All	Allergy Technologies, LLC	PAY	
		Cite-All	Pinebelt Processing, Inc.	PAY	
		Cite-All	HOMS, LLC	PAY	
		Cite-All	Garnik Industries, LLC	PAY	
		Cite-All	Winfiled Solutions, LLC	PAY	
		Cite-All	CEVA Animal Health, LLC	PAY	
		Cite-All	International Textile Group,	PAY	
			Inc.		
		Cite-All	AgSaver, LLC	PAY	
		Cite-All	Callington Haven Party, Ltd.	PAY	
		Cite-All	GAT Microencapsulation	PAY	
			GMBH		
		Cite-All	Generic Endangered Species	OWN	
			Task Force		

	Name and Title	Date
Jusse Jullis -	Jesse Lollis Regulatory Consultant	3/6/2019
Signature		0.4



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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING PERMETHRIN Date: March 6, 2019 EPA Reg No./ File Symbol: 70506-4 Applicant's/Registrant's Name and Address: UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient: Permethrin (CAS No. 52645-53-1)

Guideline Study Name	MRID Number	Submitter	Status	Note
	Cite-All	Gharda Generics, Inc.	PAY	
	Cite-All	CSPA/Permethrin Dermal	PAY	
		Absorption Group		
	Cite-All	Alpha Scents, Inc.	PAY	
	Cite-All	Fulcra Chemicals, LLC	PAY	
	Cite-All	Precision Control	PAY	
		Technology, Inc.		
	Cite-All	Permethrin Data Group II	PAY	
	Cite-All	GHI Manufacturing, Inc.	PAY	
	Cite-All	Envincio, LLC	PAY	
	Cite-All	U.S. Animal Health	PAY	
	Cite-All	Triton Systems, Inc.	PAY	
	Cite-All	Cenral Garden & Pet	PAY	
		Company		
	Cite-All	TruRx. LLC	PAY	
	Cite-All	H.L.E. Solutions	PAY	
	Cite-All	Councill for the	PAY	
		Advancement of Pyrethroid		
		Risk Assesment		
	Cite-All	OTC Chemical, LLC.	PAY	
	Cite-All	CAP IM Supply, Inc.	PAY	
	Cite-All	Florida Insect Control Group	PAY	
	Guideline Study Name	Cite-All	Cite-All Gharda Generics, Inc. Cite-All CSPA/Permethrin Dermal Absorption Group Cite-All Alpha Scents, Inc. Cite-All Fulcra Chemicals, LLC Cite-All Precision Control Technology, Inc. Cite-All Permethrin Data Group II Steering Comm. Cite-All GHI Manufacturing, Inc. Cite-All Envincio, LLC Cite-All U.S. Animal Health Cite-All Triton Systems, Inc. Cite-All Company Cite-All Trurx. LLC Cite-All Trurx. LLC Cite-All H.L.E. Solutions Cite-All Councill for the Advancement of Pyrethroid Risk Assesment Cite-All OTC Chemical, LLC. Cite-All OTC Chemical, LLC.	Cite-All Gharda Generics, Inc. PAY Cite-All CSPA/Permethrin Dermal Absorption Group Cite-All Alpha Scents, Inc. PAY Cite-All Fulcra Chemicals, LLC PAY Cite-All Precision Control PAY Technology, Inc. Cite-All Permethrin Data Group II PAY Steering Comm. Cite-All GHI Manufacturing, Inc. PAY Cite-All Envincio, LLC PAY Cite-All U.S. Animal Health PAY Cite-All Triton Systems, Inc. PAY Cite-All Cenral Garden & Pet PAY Cite-All TruRx. LLC PAY Cite-All H.L.E. Solutions PAY Cite-All H.L.E. Solutions PAY Cite-All Council for the PAY Cite-All Council for the PAY Cite-All Council for the PAY Cite-All Council Council For the PAY Cite-All Council Counci

June Julis	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
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DATA MATRIX ADDRESSING GENERIC AND PRODUCT SPECIFIC REQUIREMENTS OF THE DATA CALL-IN FOR PRODUCTS CONTAINING				
	PERMETHRIN	N .		
Date: March 6, 2019		EPA Reg No./ File Symbol: 70506-4	Page 14 of 14	
Applicant's/Registrant's Name and Address:	UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406	Product: Permethrin Technical		
Ingredient: Permethrin (CAS No. 52645-53-1)				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
		Cite-All	Evergreen Animal Health	PAY	
		Cite-All	Tevra Brands, LLC	PAY	
		Cite-All	Greenfield Envirosciences,	PAY	
			Inc.		
		Cite-All	HHL Group Limited	PAY	

Signature Vallis	Name and Title Jesse Lollis Regulatory Consultant	Date 3/6/2019
EPA Form 8570-35 (9-97) Electronic and Paper versions available. Submit only Paper version.		Agency Internal Use Copy

Please read instructions on reve	erse before completing for	m.		F	orm Ap	proved	OMB No.	2070-0060. Approval expires 2-28-95
Ş EPA ^{Er}	United a price of the control of the	Protecti	on Agency		₫ An	•	ration ment	OPP Identifier Number
Company/Product Numb	OF	Applicatio	n for Pesticide			,		2 Proposed Classification
UPL Delaware, Inc. /			Z. EPA	Product M B.	Fertic			3. Proposed Classification
4. Company/Product (Name UPL Delaware, Inc./	al	PM#		4			✓ None	
5. Name and Address of Ap UPL Delaware, Inc. c/o Pyxis Regulatory 4110 136 th St. Ct. NV Gig Harbor, WA 9833	Consulting Inc.	ode)	my prod EPA R Produ					e with FIFRA Section 3(c)(3)(b)(i), ition and labeling to:
			Section - II					
✓ Amendment – Explain	pelow.			Final printe Agency let			sponse t	o
Resubmission in respo	onse to Agency letter d	ated		Me Too" A				
☐ Notification – Explain I	pelow.			Other – Exp				
Explanation: Use additional page(s) if necessary. (For Section I and Section II.) PRIA Category R352 (65). Label amendment adding approved uses; selective-cite. The fee due is \$13,888.00 and has been paid. A receipt of PRIA pre-payment from pay.gov is included with this application. Please contact me (Nicole@PyxisRC.com, (253)853-7369) if you have any questions or need any additional information.								
			Section - III					
1. Material This Product Wil	Be Packaged In:							
Child-Resistant Packaging	Unit Packaging		Water Soluble P	ackaging		2. Ty	pe of Cor	ntainer
☐ Yes	☐ Yes		☐ Yes			l	Metal	
□ No	□ No		☐ No				Plastic	
* Certification must be submitted	If "Yes" Unit Packaging wgt.	No. per container	If "Yes" Package wgt.	No. per container	•		Glass Paper Other (Specif <u>y)</u>
3. Location of Net Contents	Information	4. Size(s) Re	tail Container					Directions
☐ Label ☐ C	ontainer					On La		accompanying product
6. Manner in Which Label is	Affixed to Product	☐ Paper glu		□ O	ther _			
			Section - IV					
1. Contact Point (Complete	items directly below fo	or identification	n of individual to b	e contacte	d, if ne	cessar	y, to pro	cess this application.)
Name Nicole O'Loughlin Senior Regulatory Consultant Title Senior Regulatory Consultant Telephone No. (Include Area Code) (253) 853-7369					-			
I certify that the statements I acknowledge that any kno both under applicable law.	I have made on this form		ments thereto are tr				e.	6. Date Application Received (Stamped)
2. Signature Miche Hougi			3. Title Senior Re	egulatory	Cons	ultant		
4. Typed Name Nicole O'Loughlin			5. Date Oct. 03, 2019					



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

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to this address.					
Certification with	Respect	to Citatio	n of Data		
Applicant's/Registrant's Name, Address, and Telephone Number UPL Delaware, Inc. c/o Pyxis Regulatory Consulting, Inc. 4 NW Gig Harbor, WA 98332 (253)853-7369	I110 136 th	St. Ct.	EPA Registration Number/File Symbol/ 91813-13		
Active Ingredient(s) and/or representative test compound(s) Permethrin			Date Oct. 03, 2019		
General Use Pattern(s) (list all those claimed for this product using 40 CF TGAI	R Part 158)		Product Name Permethrin Technical		
NOTE: If your product is a 100% repackaging of another purchased EPA-registered product labeled for all the same uses on your label, you do not need to submit this form. You must submit the Formulator's Exemption Statements (EPA Form 8570-27).					
I am responding to a Data-Call-In Notice, and have including with this form a list of companies send offer of compensation (the Data Matrix form should be used for this purpose).					
SECTION I: METHOD OF D	DATA SUPP	ORT (Chec	k one method only)		
I am using the cite-all method of support, and have included form a list of companies sent offers of compensation (the Darform should be used for this purpose).		u c	am using the selective method of support (or cite-all option inder the selective method), and have included with this form a ompleted list of data requirements (the Data Matrix form must e used).		
SECTION II: GENERAL OFFER TO PAY					
[Required if using the cite-all method or when using the cite-all option und	der the selec	tive method	to satisfy one or more data requirements]		
I hereby offer and agree to pay compensation, to other person	ons, with rega	ard to the a	pproval of this application, to the extent required by FIFRA.		
SECTIO	N III: CERTI	FICATION			
I certify that this application for registration, this form for reregis application for registration, the form for reregistration, or the Data-Call-In rindicated in Section I, this application is supported by all data in the Agenc substantially similar product, or one or more of the ingredients in this product requirements in effect on the date of approval of this application if the application.	response. In cy's files that duct; and (2)	addition, if t (1) concer is a type of	the cite-all option or cite-all option under the selective method is n the properties or effects of this product or an identical or data that would be required to be submitted under the data		
I certify that for each exclusive use study cited in support of this obtained the written permission of the original data submitter to cite that s		or reregisti	ration, that I am the original data submitter or that I have		
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (II) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.					
I certify that the statements I have made on this form and all attachments to it are true, accurate, and complete. I acknowledge that any knowingly false or misleading statement may be punishable by fine or imprisonment or both under applicable law.					
Signature Mich Lougi	Date Oct. 03	3, 2019	Typed or Printed Name and Title Nicole O'Loughlin Senior Regulatory Consultant		



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DATA MATRIX						
EPA Reg No./File Symbol 91813-13	Page 1 of 29					
Product	•					
Permethrin Technical						
	Product					

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA RE		initia italiige.	Cubilitio	- Clarac	11010
830.1550	Product Identity and Composition	44841201	UPL NA Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	44841201	UPL NA Inc.	OWN	
830.1620	Description of the Production Process	44841201	UPL NA Inc.	OWN	
830.1650	Description of the Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	44841201	UPL NA Inc.	OWN	
830.1700	Preliminary Analysis	44841201	UPL NA Inc.	OWN	
		50127101	UPL NA Inc.	OWN	
830.1750	Certified Limits	44841201	UPL NA Inc.	OWN	
830.1800	Enforcement Analytical Method	44841201	UPL NA Inc.	OWN	
830.6302	Color	44841202	UPL NA Inc.	OWN	
830.6303	Physical State	44841202	UPL NA Inc.	OWN	
830.6304	Odor	44841201	UPL NA Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	44841202	UPL NA Inc.	OWN	
830.6314	Oxidation / Reduction: Chemical Incompatibility	44841202	UPL NA Inc.	OWN	
830.6315	Flammability	44841202	UPL NA Inc.	OWN	
830.6316	Explodability	44841202	UPL NA Inc.	OWN	
830.6317	Storage Stability	48881501	UPL NA Inc.	OWN	
830.6319	Miscibility	44841202	UPL NA Inc.	OWN	
830.6320	Corrosion Characteristics	48881501	UPL NA Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required ²

Signature	Name and Title	Date
Viele Gaylin	Nicole O'Loughlin	Oct. 3, 2019
year gage	Senior Regulatory Consultant	



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Applicant's/Registrant's Name & A	Address		Product		
UPL NA Inc.	0 1 0 1 100		Permethrin Technical		
King of Prussia, P	ness Center, Suite 402				
	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7000	pH	44841202	UPL NA Inc.	OWN	
830.7050	UV / Visible Absorption	44841202	UPL NA Inc.	OWN	
830.7100	Viscosity	44841202	UPL NA Inc.	OWN	
830.7200	Melting Point / Melting Range				Not required ³
830.7220	Boiling Point / Boiling Range	44841202	UPL NA Inc.	OWN	
830.7300	Density / Relative Density / Bulk Density	44841202	UPL NA Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ⁴
830.7520	Particle Size, Fiber Length, and Diameter Distribution				Not required
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7860	Water Solubility: Generator Column Method				See 830.7840
830.7950	Vapor Pressure	44841202	UPL NA Inc.	OWN	
870.1100	Acute Oral Toxicity – rat	00242899		OLD	See endnote ⁵
870.1200	Acute Dermal Toxicity – rat	00242899		OLD	See endnote ⁶
870.1300	Acute Inhalation Toxicity – rat	41031103		OLD	
870.2400	Eye Irritation	00242899		OLD	See endnote ⁷
870.2500	Skin Irritation	00242899		OLD	See endnote ⁸
870.2600	Skin Sensitization				Not required ⁹
Signature **Missingle** **Principle** **The state of the state of t	Lougin		Name and Title Nicole O'Loughlin Senior Regulatory Consulta	nt	Date Oct. 3, 2019



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	DAT	A MATRIX			
Date October 3, 2019			EPA Reg No./File Symbol 91813-13	Page 3 of 29	
Applicant's/Registrant's Name & UPL NA Inc. 630 Freedom Bus King of Prussia, F	siness Center, Suite 402		Product Permethrin Technical		
Ingredient Permethrin (CAS	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PERMETHRIN GENERIC DATA	REQUIREMENTS				
850.2100	Acute Avian Oral Toxicity	41888401 49511902	Permethrin Data Group II Steering Committee/Joint Venture (PDGII)	OLD OWN	See endnote ¹⁰
850.2200	Acute Avian Dietary Toxicity	41888402 41888403		OLD OLD	See endnote ¹¹
850.2400	Wild Mammal Toxicity				Not required / See 870 series
850.2300	Avian Reproductive Toxicity	42322901 42322902		OLD OLD	See endnote ¹²
850.2500	Simulated or Actual Field Testing				Not required
850.1075	Freshwater Fish Toxicity	00110663 00110657 49540301	PDGII	OLD OLD OWN	See endnote ¹³
850.1010	Freshwater Invertebrate Toxicity	00110662 00110663		OLD OLD	See endnote ¹⁴
850.1025, 850.1035, 850.1045, 850.1055, 850.1075	Acute Toxicity Estuarine and Marine Organisms	41874901 42584001 43492902 49511901	PDG II	OLD OLD OLD OWN	See endnote ¹⁵
850.1300	Aquatic Invertebrate Life Cycle (Freshwater)	43745701		OLD	See endnote ¹⁶
850.1350	Aquatic Invertebrate Life Cycle (Saltwater)	49554601	PDG II	OWN	See endnote ¹⁷
Signature Pfeish	Louge		Name and Title Nicole O'Loughlin Senior Regulatory Consulta	nt	Date Oct. 3, 2019



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DATA MATRIX						
Date October 3, 2019	EPA Reg No./File Symbol 91813-13	Page 4 of 29				
Applicant's/Registrant's Name & Address	Product					
UPL NA Inc.	Permethrin Technical					
630 Freedom Business Center, Suite 402						
King of Prussia, PA 19406						
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)						

Guideline Reference Number Guideline Study Name MRID Number Status Note Submitter 850.1400 Fish Early Life Stage (Freshwater) 00110666 OLD See endnote¹⁸ 850.1400 Fish Early Life Stage (Saltwater) Not required¹⁹ 850.1500 OLD See endnote²⁰ Life Cycle Fish 00161436 850.1710, 850.1730, Aquatic Organisms Bioavailability, Biomagnification, Toxicity OLD See endnote²¹ 41300401 850.1850 OLD 41300402 41300403 OLD 850.1950 Simulated or Actual Field Testing for Aquatic Organisms Not required 850.1735 Whole Sediment: Acute Freshwater Invertebrates Not required 850.1740 Whole Sediment: Acute Marine Invertebrates Not required N/A Whole Sediment: Chronic Invertebrates Freshwater and **PDGII** OWN See endnote²² 48788101 Marine **PDGII** OWN 48788301 49063101 PDGII OWN 850.3020 Honey Bee Acute Contact Toxicity 42674501 OLD See endnote²³ OLD See endnote²⁴ 850.3030 Honeybee Toxicity of Residues on Foliage 42009301 Reserved²⁵ 850.3040 Field Testing for Pollinators SS-1149 Aquatic Invertebrate Acute Toxicity 49513901 **PDGII** OWN 870.6100 Delayed Neurotoxicity (Acute) - Hen Not required 870.6200 Acute Neurotoxicity - Rat 43046301 OLD See endnote²⁶ OLD 45657401

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Signature	Name and Title	Date
Weide Gangin	Nicole O'Loughlin	Oct. 3, 2019
Jane Garage	Senior Regulatory Consultant	



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Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

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Product
Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3100	90-Day Oral: Rodent	00025914		OLD	See endnote ²⁷
		00025915		OLD	
		00040491		OLD	
		00054737		OLD	
		00070577		OLD	
870.3150	90-Day Oral: Non-Rodent	00029832		OLD	See endnote ²⁸
		00043722		OLD	
		00070576		OLD	
		00071951		OLD	
870.3200	21/28-Day Dermal Toxicity	41143801		OLD	See endnote ²⁹
		42653301		OLD	
870.3250	90-Day Dermal Toxicity				Not required ³⁰
870.3465	90-Day Inhalation Toxicity	00096713		OLD	See endnote ³¹
870.6100	28-Day Delayed Neurotoxicity – Hen				Not required
870.6200	90-Day Neurotoxicity	00071952		OLD	See endnote ³²
		40766807		OLD	
870.4100	Chronic Oral Rodent	00069701		OLD	See endnote ³³
		00120268		OLD	

Signature	Name and Title	Date
Vicile Sough	Nicole O'Loughlin	Oct. 3, 2019
yaire gaige	Senior Regulatory Consultant	



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DATA MATRIX Date October 3, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.4200	Carcinogenicity	00069701		OLD	See endnote ³⁴
		00069703		OLD	
		00069704		OLD	
		00102110		OLD	
		00120268		OLD	
		45597105		OLD	
870.3700	Reproduction / Developmental Toxicity Screening Test	40943602		OLD	See endnote ³⁵
		40943603		OLD	
870.3800	2-Generation Reproduction: Rat	00102108		OLD	See endnote ³⁶
		00120271		OLD	
870.6300	Developmental Neurotoxicity Study				Not required ³⁷
870.5100	Bacterial Reverse Mutation Test	41031107		OLD	See endnote ³⁸
870.5300, 870.5375	In vitro Mammalian Cell Assay				Not required
870.5385, 870.5395,	In vivo Cytogenetics and Other Effects	40943604		OLD	See endnote ³⁹
870.5450, 870.5550		42723302		OLD	
870.7485	Metabolism and Pharmacokinetics	00054719		OLD	See endnote ⁴⁰
		00054720		OLD	
		00065903		OLD	
		00089006		OLD	
		00102185		OLD	
870.7200	Companion Animal Safety				Not required / Formulation specific

Signature	Name and Title	Date
View Doude	Nicole O'Loughlin	Oct. 3, 2019
7	Senior Regulatory Consultant	



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	DATA MA	TRIX			
Date October 3, 2019			EPA Reg No./File Symbol 91813-13		Page 7 of 29
Applicant's/Registrant's Name & A	Address		Product		
UPL NA Inc.			Permethrin Technical		
630 Freedom Busi King of Prussia, P	ness Center, Suite 402				
•	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7600	Dermal Penetration	43169001		OLD	See endnote ⁴¹
870.7800	Immunotoxicity				Not required ⁴²
875.1100	Dermal Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1200	Dermal Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1300	Inhalation Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1400	Inhalation Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1500	Biological Monitoring		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1600	Data Reporting and Calculations		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1700	Product Use Information		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
075 0400	District and the Californ Desides and Total Transferrable Desides	40755704		OL D	
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	43755701		OLD	
075 0000	Cail Desidue Dissination	44955501	A suiscultural Decartur TE	OLD	Coo andrata44
875.2200	Soil Residue Dissipation		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN	See endnote ⁴⁴
875.2400	Dermal Exposure		Agricultural Reentry TF	OWN	See endnote ⁴⁴
073.2400	Definal Exposure		Outdoor Residential Exposure TF	OWN	See endriote
875.2500	Inhalation Exposure		Agricultural Reentry TF	OWN	See endnote ⁴⁴
0.0.2000	Timataion Exposure		Outdoor Residential Exposure TF	OWN	
875.2600	Biological Monitoring		Agricultural Reentry TF	OWN	See endnote ⁴⁴
			Outdoor Residential Exposure TF	OWN	

Signature	Name and Title	Date
Neide House	Nicole O'Loughlin Senior Regulatory Consultant	Oct. 3, 2019



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	DATA	MATRIX			
Date October 3, 2019			EPA Reg No./File Symbol 91813-13		Page 8 of 29
King of Prussia, P	siness Center, Suite 402 PA 19406		Product Permethrin Technical		
•	No.: 52645-53-1; Chemical Code: 109701)		Ta		T
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2700	Product Use Information		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2800	Descriptions of Human Activity		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2900	Data Reporting and Calculations		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.3000	Nondietary Ingestion Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
201-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
202-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
890.1100	Amphibian Metamorphosis (Rat)	48988601	PDGII	OWN	See endnote ⁴⁶
890.1150	Androgen Receptor Binding (Rat Prostate)				Not applicable / See endnote ⁴⁷
890.1200	Aromatase (Human Recombinant)	48618601	PDGII	OWN	See endnote ⁴⁸
890.1250	Estrogen Receptor Binding				Not applicable / See endnote ⁴⁷
890.1300	Estrogen Receptor Transcriptional Activation Assay				Not applicable / See endnote ⁴⁷
890.1350	Fish Short-Term Reproduction	48702301	PDGII	OWN	See endnote ⁴⁹
890.1400	Hershberger (Rat)	48618602	PDGII	OWN	See endnote ⁵⁰
890.1450	Female Pubertal (Rat)	48672901	PDGII	OWN	See endnote ⁵¹
Signature Misk	Dough		Name and Title Nicole O'Loughlin Senior Regulatory Consulta	ant	Date Oct. 3, 2019



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DATA MATRIX Date October 3, 2019 EPA Reg No./File Symbol 91813-13 Page 9 of 29 Applicant's/Registrant's Name & Address Product UPL NA Inc. Permethrin Technical 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701) **Guideline Reference Number Guideline Study Name MRID Number** Status Note Submitter 890.1500 Male Pubertal (Rat) 48687101 **PDGII** OWN See endnote⁵² 890.1550 Steroidogenesis 48618603 **PDGII** OWN See endnote⁵³ 890.1600 Uterotrophic (Rat) Not applicable / See endnote⁴⁷ 49475301 **PDGII** OWN See endnote⁵⁴ 850.4100 Tier 1: Seedling Emergence 850.4150 Tier 1: Vegetative Vigor 49475302 **PDGII** OWN See endnote55 850.4400, 850.4500 Tier 1: Aquatic Plant Growth 49398801 **PDGII** OWN See endnote⁵⁶ 49398803 **PDGII** OWN OWN 49398804 **PDGII PDGII** OWN 49398805 **PDGII** OWN See endnote⁵⁴ 850.4100 Tier 2: Seedling Emergence 49475301 850.4150 49475302 **PDGII** OWN See endnote55 Tier 2: Vegetative Vigor 850.4400, 850.4500 Tier 2: Aquatic Plant Growth 49398801 **PDGII** OWN See endnote⁵⁶ **PDGII** OWN 49398803 49398804 **PDGII** OWN 49398805 **PDGII** OWN 850.4300 Terrestrial Field Not required 850.4450 Aquatic Field Not required 850.4025 Target Area Phytotoxicity Not required 850.4550 Cyanobacteria Toxicity 49398802 PDGII OWN See endnote⁵⁷ 835.2120 00102043 See endnote⁵⁸ Hydrolysis Signature Name and Title Date Neide Jougin Nicole O'Loughlin Oct. 3, 2019 Senior Regulatory Consultant



835.6300

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	D.	ATA MATRIX			
Date October 3, 2019			EPA Reg No./File Symbol 91813-13		Page 10 of 29
Applicant's/Registrant's Name &	Address		Product		
UPL NA Inc.			Permethrin Technical		
	siness Center, Suite 402				
King of Prussia, P					
· ·	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.2240	Photodegradation in Water	40242801		OLD	See endnote ⁵⁹
		49542801	PDGII	OWN	
835.2410	Photodegradation in Soil	40190101		OLD	See endnote ⁶⁰
835.2370	Photodegradation in Air				Not required
835.4100	Aerobic Soil Metabolism	42410002		OLD	See endnote ⁶¹
		49622001	PDGII	OWN	
835.4200	Anaerobic Soil Metabolism	41970601		OLD	See endnote ⁶²
		49728101	PDGII	OWN	
835.4300	Aerobic Aquatic Metabolism	43938201		OLD	See endnote ⁶³
		49624902	PDGII	OWN	
835.4400	Anaerobic Aquatic Metabolism	43982001		OLD	See endnote ⁶⁴
		49624903	PDGII	OWN	
835.1230	Leaching / Adsorption / Desorption	41868001		OLD	See endnote ⁶⁵
		43424901		OLD	
		45170102		OLD	
		49624901	PDGII	OWN	
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required
835.6100	Soil Field Dissipation Study	42359101		OLD	
835.6200	Aquatic Sediment Field Dissipation Study	44030501		OLD	
		44157101		OLD	

Signature	Name and Title	Date
Neide Sandi	Nicole O'Loughlin	Oct. 3, 2019
year garage	Senior Regulatory Consultant	

Forest Field Dissipation Study

Not required



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DATA MATRIX

Date October 3, 2019 EPA Reg No./File Symbol 91813-13 Page 11 of 29 Applicant's/Registrant's Name & Address Product UPL NA Inc. Permethrin Technical 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701) **Guideline Reference Number Guideline Study Name MRID Number** Status Note Submitter 835.6400 Combination and Tank Mixes Not required 835.7100 **Ground Water Monitoring** Not required PDGII OWN 850.6100 **Environmental Chemistry Methods** 49263701 49421001 PDGII OWN SS-1099 Leachability from Treated Wood 49638201 PDGII OWN 49638202 PDGII OWN PER SS-1065 POTW Treatability Study 48762906 Pyrethroid Working Group 860.1300 Nature of the Residue: Plants 00025919 OLD 00025920 OLD 00094393 OLD 00094394 OLD OLD 43307801 860.1300 Nature of the Residue: Livestock 42196702-03 OLD OLD 42410001 42503201 OLD 43458801-02 OLD 43505201 OLD 43713301-04 OLD 43962801 OLD 44196101-02 OLD 44417803 OLD 860.1850 **Confined Rotational Crops** 43174401 OLD Signature Name and Title Date

Neide Jougin

Nicole O'Loughlin

Senior Regulatory Consultant

Oct. 3, 2019



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Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1340	Residue Analytical Methods	00043877		OLD	
		00054724		OLD	
		00064675		OLD	
		00064678		OLD	
		00070916		OLD	
		00072582		OLD	
		00160394		OLD	
		40404002		OLD	
		40446403-04		OLD	
		40556804		OLD	
		41641001		OLD	
		42137202		OLD	
		43364705		OLD	
		43962801		OLD	
		44196103		OLD	
		44417801-02		OLD	
		44428204		OLD	
860.1360	Multiresidue Method	00070914		OLD	

Signature	Name and Title	Date
Neide Ganglin	Nicole O'Loughlin	Oct. 3, 2019
year garage	Senior Regulatory Consultant	



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WASHINGTON, D.C. 20460

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DATA MATRIX Date October 3, 2019 EPA Reg No./File Symbol 91813-13 Page 13 of 29 Applicant's/Registrant's Name & Address Product UPL NA Inc. Permethrin Technical 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701) **Guideline Study Name Guideline Reference Number MRID Number** Status Note Submitter 860.1380 Storage Stability 00102107 OLD OLD 00110622 OLD 00137902 00165525 OLD OLD 41560202 42919201 OLD OLD 43494701 43505201 OLD OLD 44135001 **PDGII** OWN 48598605 **PDGII** OWN 48598606 860.1500 00025992 OLD Magnitude of the Residue in Plants: alfalfa (including grown for seed) 00026551-52 OLD 00047632 OLD 00047634-35 OLD 00151832 OLD OLD 40072401 42909001 OLD 43343101 OLD 860.1500 Magnitude of the Residue in Plants: almond 00100520 OLD OLD 00110564 42322903 OLD 43938801 OLD Signature Name and Title Date Weish Jougin Nicole O'Loughlin Oct. 3, 2019

Senior Regulatory Consultant



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DATA MATRIX

Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

DATA MATRIX

EPA Reg No./File Symbol 91813-13

Product
Permethrin Technical
Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: artichoke	00145266		OLD	
		42137201		OLD	
860.1500	Magnitude of the Residue in Plants: asparagus	40446401-02		OLD	
860.1500	Magnitude of the Residue in Plants: avocado	00144307		OLD	
		41565401		OLD	
		44229501		OLD	
860.1500	Magnitude of the Residue in Plants: broccoli	00034774		OLD	
		00034778		OLD	
		00080054		OLD	
		41065802		OLD	
		43903501		OLD	
860.1500	Magnitude of the Residue in Plants: Brussels sprouts	00034775		OLD	
		00080054		OLD	
860.1500	Magnitude of the Residue in Plants: cabbage	00034779		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00110693		OLD	
		00156265		OLD	
		41065802		OLD	
		48598601	PDGII	OWN	

Signature	Name and Title	Date
21. 1 Pl 1.	Nicole O'Loughlin	Oct. 3, 2019
Efficie Lough	Senior Regulatory Consultant	, , ,



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Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: cavallo broccolo	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	
860.1500	Magnitude of the Residue in Plants: cauliflower	00034776		OLD	
		00080054		OLD	
		41065802		OLD	
860.1500	Magnitude of the Residue in Plants: cherry	41065803		OLD	
		44135001		OLD	

Signature	Name and Title	Date
Viciola Dougle	Nicole O'Loughlin	Oct. 3, 2019
yactor gauge	Senior Regulatory Consultant	·



Signature

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W. WASHINGTON, D.C. 20460

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DATA MATRIX Date October 3, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number Guideline Study Name MRID Number Status Note Submitter 860.1500 Magnitude of the Residue in Plants: Chinese broccoli 00034774 OLD OLD 00034778-89 OLD 00080054-55 00080057-58 OLD OLD 00105293 00110693 OLD OLD 00155947 00156265 OLD OLD 41065802 OLD 41575901 OLD 43903501 860.1500 OLD Magnitude of the Residue in Plants: Chinese cabbage 00034774 00034778-89 OLD 00080054-55 OLD 00080057-58 OLD OLD 00105293 OLD 00110693 00155947 OLD 00156265 OLD 41065802 OLD 41575901 OLD 43903501 OLD OWN 48598601 **PDGII**

Neich Dougin

Name and Title

Nicole O'Loughlin

Senior Regulatory Consultant

Date

Oct. 3, 2019



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 401 M Street, S.W.

WASHINGTON, D.C. 20460

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	DATA MA	TRIX			
Date October 3, 2019			EPA Reg No./File Symbol 91813-13		Page 17 of 29
Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406		Product Permethrin Technical			
	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: collards	00150293		OLD	
		00155947		OLD	
		41575901		OLD	
		48639202	PDGII	OWN	
860.1500	Magnitude of the Residue in Plants: corn (field, pop, sweet,	00034777-78		OLD	
	grown for seed)	00069651-52		OLD	
		00088973		OLD	
		41052402		OLD	
		41065804		OLD	
		43149501		OLD	
		43350503		OLD	
		43364701-02		OLD	
860.1500	Magnitude of the Residue in Plants: cucurbit vegetables, crop	00126691		OLD	
	group 9	00151251		OLD	
		00155167		OLD	
		40556801-03		OLD	
		41565402		OLD	
		41565405		OLD	
		44182701-02		OLD	
860.1500	Magnitude of the Residue in Plants: eggplant	00129296		OLD	
		41565403		OLD	
860.1500	Magnitude of the Residue in Plants: filbert (hazelnut)	00142263		OLD	
860.1500	Magnitude of the Residue in Plants: garlic	40404001		OLD	
Signature Uficial	Louge		Name and Title Nicole O'Loughlin Senior Regulatory Consultar	nt	Date Oct. 3, 2019



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DATA MATRIX				
Date October 3, 2019	EPA Reg No./File Symbol 91813-13	Page 18 of 29		
Applicant's/Registrant's Name & Address	Product	·		
UPL NA Inc. Permethrin Technical				
630 Freedom Business Center, Suite 402				
King of Prussia, PA 19406				
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: horseradish	00094610		OLD	
		41565404		OLD	
860.1500	Magnitude of the Residue in Plants: kiwifruit	00072579-80		OLD	
		00072585		OLD	
860.1500	Magnitude of the Residue in Plants: kohlrabi	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	

	<u></u>	
Signature	Name and Title	Date
Weide Gangin	Nicole O'Loughlin	Oct. 3, 2019
Jane Garage	Senior Regulatory Consultant	



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DATA MATRIX				
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Product	Product			
Permethrin Technical				
	EPA Reg No./File Symbol 91813-13 Product			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter Status	Note
860.1500	Magnitude of the Residue in Plants: leafy vegetables (except	00025921	OLD	
	brassica vegetables), crop group 4	00034780-81	OLD	
		00081628	OLD	
		00102082	OLD	
		00110622	OLD	
		00139530	OLD	
		00140140	OLD	
		00150293	OLD	
		00155947	OLD	
		00156265	OLD	
		41065808	OLD	
		41575901	OLD	
		42322904	OLD	
		42431401	OLD	
		42979901	OLD	
		43350501-02	OLD	
860.1500	Magnitude of the Residue in Plants: mushrooms	00165524	OLD	
860.1500	Magnitude of the Residue in Plants: nectarines	00118504	OLD	
		43348101	OLD	
860.1500	Magnitude of the Residue in Plants: onion	40404001	OLD	
860.1500	Magnitude of the Residue in Plants: papaya	00144307	OLD	
		41565401	OLD	
		44453101	OLD	
Signature Mich Loufe			Name and Title Nicole O'Loughlin Senior Regulatory Consultant	Date Oct. 3, 2019



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DATA MATRIX

Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

DATA MATRIX

EPA Reg No./File Symbol 91813-13

Product

Permethrin Technical

Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: parsley	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	
860.1500	Magnitude of the Residue in Plants: peach	00118504		OLD	
		43348101		OLD	
860.1500	Magnitude of the Residue in Plants: peppers (bell)	00129296		OLD	
		41565403		OLD	
		43494701		OLD	
<u> </u>		43498101		OLD	

Signa	ature	Name and Title	Date
	Weide Soude	Nicole O'Loughlin	Oct. 3, 2019
	yacre going	Senior Regulatory Consultant	



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Product				
Product				
Permethrin Technical				
UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406				

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: pistachio	00133293		OLD	
		41065805		OLD	
		41641002		OLD	
860.1500	Magnitude of the Residue in Plants: pome fruits, crop group	00042620-21		OLD	
	11	00083972		OLD	
		42322905		OLD	
		42838101		OLD	
860.1500	Magnitude of the Residue in Plants: potato	00025985-86		OLD	
		00081578-79		OLD	
		43343102		OLD	
		44162601		OLD	
860.1500	Magnitude of the Residue in Plants: range grasses	00128728		OLD	
		41565406		OLD	
		48598603	PDGII	OWN	

	<u></u>	
Signature	Name and Title	Date
Weide Gangin	Nicole O'Loughlin	Oct. 3, 2019
Jane Garage	Senior Regulatory Consultant	



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Date October 3, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Study Name Guideline Reference Number MRID Number Status Note Submitter 860.1500 Magnitude of the Residue in Plants: roquette (arugula) 00025921 OLD OLD 00034780-81 OLD 00081628 OLD 00102082 OLD 00110622 00139530 OLD OLD 00140140 00150293 OLD 00155947 OLD OLD 00156265 OLD 41065808 41575901 OLD OLD 42322904 OLD 42431401

42979901

43350501-02

Signature	Name and Title	Date
Viciola Dougle	Nicole O'Loughlin	Oct. 3, 2019
yactor gauge	Senior Regulatory Consultant	·

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DATA MATRIX Date October 3, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 EPA Reg No./File Symbol 91813-13 Page 23 of 29 Product Permethrin Technical

Guideline Study Name Guideline Reference Number MRID Number Status Note Submitter 860.1500 Magnitude of the Residue in Plants: soybeans 00026542 OLD OLD 00026548 OLD 00057091 OLD 00110622 OLD 00135413 00137902 OLD OLD 00144855 00155947 OLD 00165525 OLD OLD 43364704 860.1500 Magnitude of the Residue in Plants: spinach 00150293 OLD OLD 41065808 42431401 OLD 42979901 OLD OLD 43350502 OLD 860.1500 Magnitude of the Residue in Plants: tomatillos 00026543 OLD 00026546 00034785 OLD 00110622 OLD 00140140 OLD OLD 41404301 42322903 OLD

Signature	Name and Title	Date
Weide Gauge	Nicole O'Loughlin	Oct. 3, 2019
years young	Senior Regulatory Consultant	



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Date October 3, 2019	EPA Reg No./File Symbol 91813-13	Page 24 of 29	
Applicant's/Registrant's Name & Address	Product		
UPL NA Inc.	Permethrin Technical	Permethrin Technical	
630 Freedom Business Center, Suite 402			
King of Prussia, PA 19406			
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: tomato	00026543		OLD	
		00026546		OLD	
		00034785		OLD	
		00110622		OLD	
		00140140		OLD	
		41404301		OLD	
		42322903		OLD	
860.1500	Magnitude of the Residue in Plants: turnips	00155947		OLD	1
		41575901		OLD	
860.1500	Magnitude of the Residue in Plants: walnut	00072833		OLD	
		42322906		OLD	
860.1500	Magnitude of the Residue in Plants: watercress	00145971		OLD	
		00157481		OLD	
		41565407		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: corn	42860601		OLD	
		42910101		OLD	
		43374601		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: apple	42824702		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: potato	42824701		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed:	00070912		OLD	
	soybeans	43364703		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: tomato	41404301		OLD	
Signature			Name and Title		Date

Neide Jougin

Nicole O'Loughlin

Senior Regulatory Consultant

Oct. 3, 2019



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DATA MATRIX			
Date October 3, 2019	EPA Reg No./File Symbol 91813-13	Page 25 of 29	
Applicant's/Registrant's Name & Address	Product		
UPL NA Inc.	Permethrin Technical	Permethrin Technical	
630 Freedom Business Center, Suite 402			
King of Prussia, PA 19406			
Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)			

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs	00054723		OLD	
		00064674		OLD	
		00064676		OLD	
		00064679-80		OLD	
		00064682-86		OLD	
		00070914-15		OLD	
		00070917		OLD	
		00079385-87		OLD	
		00110624		OLD	
		41560201		OLD	
860.1400	Nature and Magnitude of the Residue in Potable Water				Not required
860.1400	Magnitude of the Residue in Fish				Not required
860.1400	Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water				Not required
860.1460	Magnitude of the Residue in Food Handling Establishments				Not required
860.1900	Field Rotational Crops	44428201-03		OLD	

Signature	Name and Title	Date
Viole Dougli	Nicole O'Loughlin	Oct. 3, 2019
year garge	Senior Regulatory Consultant	

Data Matrix Endnotes for Permethrin Technical

- 830.1650 These data are not required for registration of a technical grade active ingredient. Refer to guideline 830.1620.
- ² **830.6321 –** Product is not used around electrical equipment.
- ³ **830.7200 –** Product is a liquid.
- ⁴ **830.7370 –** No significant acidic or basic moieties
- 870.1100 The study cited is acceptable and satisfies the data requirement as per the Jun. 30, 2017 Permethrin: Human Health Draft Risk Assessment for Registration Review (DP Barcode: D414137) (Human Health Risk Assessment).
- 6 870.1200 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- 7 870.2400 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- 8 870.2500 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁹ **870.2600 –** The Permethrin RED stated that these data are not required.
- 850.2100 The study cited is acceptable and satisfies the data requirement as per the June 20, 2011 EFED Registration Review Preliminary Problem Formulation for Permethrin (DP Barcode: D384703) (Problem Formulation) and the RED. Passerine data were required as per the Dec. 12, 2012 Permethrin Generic Data Call-In (GDCI-109701-1252) (2012 GDCI). These data were submitted under MRID No. 49511902.
- ¹¹ **850.2200** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹² **850.2300 –** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- 850.1075 The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the Sept. 30, 2016 Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and the Pyrethrins (DP Barcodes: D425791, D429461, D433338, D433339, D435888) (EFED Risk Assessment).
- 850.1010 The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 850.1025, 850.1035, 850.1045, 850.1055, 850.1075 The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the EFED Risk Assessment. MRID No. 42584001 is also cited. Additional data were required as per the 2012 GDCI and were submitted under MRID No. 49511901.
- 16 850.1300 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 850.1350 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁸ **850.1400 –** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 19 850.1400 These data are not required as per the Problem Formulation and the EFED Risk Assessment.
- ²⁰ **850.1500** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation.

Data Matrix Endnotes for Permethrin Technical

- ²¹ **850.1710, 850.1730, 850.1850 –** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 22 N/A The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ²³ **850.3020** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- ²⁴ **850.3030** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 850.3040 As per the Problem Formulation, these data are reserved pending the requirement for a refined pollinator risk assessment.
- 870.6200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 27 870.3100 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 28 870.3150 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 29 870.3200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment. Note: an invalid MRID was referenced in the Human
- 30 870.3250 These data are not required as per the Human Health Risk Assessment.
- 31 870.3465 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- 870.6200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 33 870.4100 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 34 870.4200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3700 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 36 870.3800 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁷ **870.6300 –** These data are not required as per the Human Health Risk Assessment.
- 870.5100 The study cited is acceptable and satisfies the data requirement as per the RED and the June 15, 2011 Permethrin: Registration Review Scoping Document for Human Health Assessments (DP Barcode: D384702) (Scoping Document). The MRID referenced in the Human Health Risk Assessment appears to be an error.
- ³⁹ **870.5385, 870.5395, 870.5450, 870.5550** The studies cited are acceptable and satisfy the data requirement as per the RED and the Scoping Document. The MRID Nos. referenced in the Human Health Risk Assessment appear to be in error.
- ⁴⁰ **870.7485** The studies cited are acceptable and satisfy the data requirement as per the RED or the Human Health Scoping Document. MRID Nos. 00065903 and 00102185 are also cited.
- ⁴¹ **870.7600** The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁴² **870.7800 –** These data are not required as per the Human Health Risk Assessment.

- ⁴³ **875.1100**, **875.1200**, **875.1300**, **875.1400**, **875.1500**, **875.1600**, **875.1700** UPL NA Inc. is a member is good standing of the Agricultural Handler Exposure Task Force (AHETF).
- 44 875.2200, 875.2300, 875.2400, 875.2500, 875.2600, 875.2700, 875.2800, 875.2900, 875.3000 UPL NA Inc. is a member is good standing of the Agricultural Reentry Task Force (ARTF) and the Outdoor Residential Exposure Task Force (ORETF).
- ⁴⁵ **201-1, 202-1 –** UPL NA Inc. is a member is good standing of the Spray Drift Task Force (SDTF).
- 46 890.1100 The study cited is acceptable and satisfies the data requirement as per the June 29, 2015 EPA Memorandum *Permethrin: Data Evaluation Records (DERs) for EDSP Tier 1 Assays* (DP Barcodes: D398301, D401793, D405670) (EDSP DERs).
- ⁴⁷ **890.1150, 890.1250, 890.1300, 890.1600** As per the EDSP DERs, this data requirement is not applicable, and the requirement has been satisfied by other scientifically relevant information (OSRI).
- ⁴⁸ **890.1200** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁴⁹ **890.1350 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁰ **890.1400 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵¹ **890.1450** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵² **890.1500** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵³ **890.15500 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- 850.4100 These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- 850.4150 These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- ⁵⁶ **850.4400, 850.4500** The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ⁵⁷ **850.4550** The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment
- 58 835.2120 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 835.2240 The study cited is supplemental and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49542801.
- 835.2410 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 835.4100 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49622001.
- 835.4200 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49728101.
- 835.4300 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624902.
- 835.4400 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624903.

Data Matrix Endnotes for Permethrin Technical

835.1230 – The studies cited partially satisfy the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624901.

Please read instructions on reverse bef	ore completing form.	Fo	rm Approved, OMB No	o. 2070-0060, App	proval expires 05-31-98
	United Stat	tes	☐ Registra	ition	OPP Identifier Number
EPA Env	rironmental Prote	ection Agency	⊠ Amendr	nent	
	Washington, DO	C 20460	☐ Other		
	Appli	cation for Pe	sticide - Section	n I	
1. Company/Product Number			Product Manager th Fertich		3. Proposed Classification
UPL Delaware, Inc./91813-13 4. Company/Product (Name)		PM#	un retuch		None Restricted
Permethrin Technical		4			Moric Mestricted
5. Name and Address of Applicant (nclude ZIP Code)				vith FIFRA Section 3(c)(3)
UPL Delaware, Inc. 630 Freedom Business Cen	tor Sto 102	` , ` , `	ny product is simila	ar or identical i	in composition and labeling
King of Prussia, PA 19406	lei, 3le. 402	to:	eg. No		
33					
Check if this is a new a	ddress	Produc	t Name		
Oneon in the leaf in the in a		Sectio	n – II		
Amendment – Explain below.				ele in response to	Agency letter dated
Resubmission in response to A	agency letter dated		"Me Too" Applica		Agency letter dated
Notification - Explain below.			Other - Explain		
Explanation: Use additiona	I page(s) if necess	ary. (For Section			
PRIA category R351 - Amendme	nt adding a new unre	egistered source of	of active ingredient.	Please see cove	r letter for additional details.
		Castia	III		
		Sectio	rı - III		
 Material This Product Will Be Pa Child-Resistant Packaging 	Ckaged In: Unit Packaging		Water Soluble Pack	kaging	Type of Container
Yes*	Yes		Yes	99	Metal
☐ No	☐ No		☐ No		Plastic
	If "Yes" Unit Packaging wo	No. per at. container	If "Yes"	No. per	Glass
*Certification must	Offit Fackaging wg	gt. Container	Package wgt.	container	Paper
be submitted	4 0:-	a(a) Datail Cantain		5 Laastian a	Other (Specify)
3. Location of Net Contents Information Label	ation 4. Siz	e(s) Retail Contain	er	5. Location of On Labe	of Label Directions
	alliel			= -	ing accompanying product
6. Manner in Which Label is Affixed	to Product Li	ithograph	Other		
		aper glued tenciled			
		Sectio	n - IV		
Contact Point (Complete items d	rectly below for identific	cation of individual t	to be contacted, if nece	essary, to process	this application)
Name Crystal Loydon		Title	Managar		Telephone No. (Include Area
Crystal Layton		Regulatory	ivianager		Code) 229-583-3006
I certify that the statements I have r I acknowledge that any knowingly founder applicable law.		II attachments there			6. Date Application Received (Stamped)
2. Signature	n	3. Title Regulatory	Manager		
4. Typed Name Crystal Layton		5. Date 12/17/2019			

EPA Form 8570-1 (Rev. 8-94) Previous editions are obsolete

White- EPA File Copy (original) Yellow- Applicant Copy



UPL Delaware, Inc. 630 Freedom Business Center Suite 402 King of Prussia, PA 19406 Tel: 610-491-2800 Fax: 610-491-2860

January 10, 2017

To Whom It May Concern:

Re: Letter of Authorization

Dear Sir or Madam:

Please let this letter serve to confirm that Pyxis Regulatory Consulting, Inc. is authorized to act as <u>Consultant</u> for UPL Delaware, Inc. (EPA Company Number 91813), before the U.S. Environmental Protection Agency and state governmental agencies in all matters regarding our pesticide registrations pursuant to the Federal Insecticide, Fungicide and Rodenticide Act (FIFRA), 7 U.S.C. § 136 et seq. and state law. <u>This is a change from their previous status as Agent.</u>

If you have any questions, please do not hesitate to contact me.

Sincerely,

Madeline Palac

Treasurer/Director

Cc: Pyxis Regulatory Consulting, Inc.



4110 136TH ST CT NW
GIG HARBOR, WA 98332
T: (253) 853-7369
F: (253) 853-5516
NICOLE@PYXISRC.COM

Oct. 3, 2019

ELECTRONIC SUBMISSION

Beth Fertich (PM 4)
Document Processing Desk (**AMEND**)
Office of Pesticide Programs (7504P)
U.S. Environmental Protection Agency
Room S-4900, One Potomac Yard
2777 S. Crystal Drive
Arlington, VA 22202

RE: UPL Delaware, Inc., Permethrin Technical (EPA Reg. No. 91813-13) PRIA R352 Amendment; Adding Approved Uses; Selective-cite

Dear Ms. Fertich,

On behalf of UPL Delaware, Inc., we are submitting an application to amend the registration of Permethrin Technical (EPA Reg. No. 91813-13) to add approved food uses to the label. These uses are found on several end-use product labels (EPA Reg. Nos. 70506-09 and 70506-66). The uses being added have established tolerances for permethrin according to CFR §180.378 and the revised crop group listings are consistent with 40 CFR §180.41. In addition to consistency with the tolerance expression for permethrin, the revised crop grouping is found on several end-use product labels (EPA Reg. Nos. 89459-45 and 8329-34). UPL Delaware, Inc. wants to ensure that its technical label is as comprehensive as possible.

In support of this label amendment, we are submitting the following documents:

- 1. Application for Amended Pesticide Registration (EPA Form 8570-1)
- 2. One (1) copy of Permethrin Technical Label with changes tracked
- 3. One (1) copy of Permethrin Technical Label with changes incorporated
- 4. Certification with Respect to Citation of Data (EPA Form 8570-34)
- 5. Agency Internal Use Copy of the Data Matrix (EPA Form 8570-35)
- 6. Public File Copy of the Data Matrix (EPA Form 8570-35)
- 7. Copy of PRIA receipt of payment
- 8. Letter of Authorization

UPL Delaware, Inc. is using the selective-cite method of support. As per EPA's interpretations of 40 CFR Parts 152.90 - 152.96, UPL Delaware, Inc. submitted notices of intent to apply and offers to pay to the extent required by FIFRA § 3(c)(1)(F). The PRIA fee for this action is \$13,888.00 and has been paid. It falls under PRIA Category R352.

Please contact me ((253) 853-7369, Nicole@PyxisRC.com) if you have any questions or need any additional information.

Sincerely,

Enclosures

cc: C. Layton; UPL Delaware, Inc.

Nicole O'Loughlin

Neide Lougin

Commercial/financial information may be entitled to confidential treatment



Confirmation

Your payment has been submitted to the designated government agency through Pay.gov and the details are below. Please note that this is just a confirmation of transaction submission. To confirm that the payment processed as expected, you may refer to your bank statement on the scheduled payment date. If you have any questions or wish to cancel this payment, you will need to contact the agency you paid at your earliest convenience.

Tracking Information

Pay.gov Tracking ID: 26KKALBC

Agency Tracking ID: 75854376894

Form Name: Pesticide Registration Improvement Act - Prepayment

Application Name: PRIA Service Fees

Payment Information

Payment Type: Bank account (ACH)

Payment Amount: \$13,888.00

Transaction Date: 10/03/2019 02:22:19 PM EDT

Payment Date: 10/04/2019

Registration Number: 91813-13

Company Name: UPL Delaware Inc.

Company Number: 91813

Action Code: R352

Account Information

Account Holder Name: UPL NA Inc.

Routing Number:

Account Number: ********2762



UPL Delaware, Inc. 630 Freedom Business Center Suite 402 King of Prussia, PA 19406 Tel: 610-491-2800 Fax: 610-491-2860

December 17, 2019

MRID 51024200

VIA CDX

Elizabeth Fertich, PM 4
Registration Division, IVB1
Document Processing Desk (REGFEE)
US Environmental Protection Agency
Office of Pesticide Programs (7505P)
One Potomac Yard
2777 South Crystal Drive
Arlington, VA 22202

2703-347-8560

Subject:

Alternate Source Amendment PRIA R351 PERMETHRIN TECHNICAL

(EPA Reg. No. 91813-13)

Dear Ms. Fertich,

This amendment submission is being made to add an alternate unregistered source of active ingredient to the registration of PERMETHRIN TECHNICAL (EPA Reg. No. 91813-13).

The following are provided in support of this amendment:

- Application for Pesticide Registration, EPA form 8570-1
- Receipt of PRIA pre-payment from pay.gov
- Confidential Statement of Formula, EPA Form 8570-4 (Alternate Formulation #2)
- Certification with Respect to Citation of Data, EPA Form 8570-34
- Agency Internal Use Copy of the Data Matrix, EPA Form 8570-35
- Public File Copy of the Data Matrix, EPA Form 8570-35
- Data to support this amendment:

Guideline	Study Title	MRID No.
830.1550,	Permethrin Technical Product Identity and	51024201
830.1600,	Composition, Description of Materials Used,	
830.1620,	Description of the Production Process,	
830.1670,	Discussion of the Formation of Impurities, and	
830.1750	Certified Limits. Study No. UPLD-2019-3	

Guideline	Study Title	MRID No.
830.1700,	Five Batch Analysis of Permethrin Technical.	51024202
830.1800	Study No. G15155	

This new source of permethrin qualifies as an alternate to our existing manufacturing document on file with the Agency for this registration. This action falls under PRIA category R351 (Amendment adding a new unregistered source of active ingredient). The fee for this action is \$13,888 and has been paid.

Should you require additional information or have questions concerning this submission, please contact me via email at crystal.layton@upl-ltd.com or phone at 229-583-3006.

Sincerely,

Cauton Crystal Layton

Regulatory Manager





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY 1200 Pennsylvania Avenue, N.W. WASHINGTON, D.C. 20460

Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 1.25 hours per response for registration and 0.25 hours per response for reregistration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, Collection Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avenue, N.W., Washington, DC 20460. Do not send the completed form

Strategies Division (2822T), U.S. Environmental Protection Agency, 1200 Pennsylvania Avento this address.	ue, N.W., Washingtor	a, DC 20460. Do not send the completed form			
Certification with Respect to C	Citation of Data				
Applicant's/Registrant's Name, Address, and Telephone Number UPL Delaware, Inc., 630 Freedom Business Center, Suite 402, King of Prussia, PA	. 19406	EPA Registration Number/File Symbol 91813-13			
Active Ingredient(s) and/or representative test compound(s) Permethrin		Date 12/17/2019			
General Use Pattern(s) (list all those claimed for this product using 40 CFR Part 158) technical grade active ingredient-terrestrial food, non-food)	Product Name Permethrin Technical			
NOTE: If your product is a 100% repackaging of another purchased EPA-registere submit this form. You must submit the Formulator's Exemption Statement (EPA Form		r all the same uses on your label, you do not need to			
I am responding to a Data-Call-In Notice, and have included with this form a be used for this purpose).	list of companies se	nt offers of compensation (the Data Matrix form should			
SECTION I: METHOD OF DATA SUPP	ORT (Check one me	ethod only)			
I am using the cite-all method of support, and have included with this form a list of companies sent offers of compensation (the Data Matrix form should be used for this purpose).	under the	the selective method of support (or cite-all option selective method), and have included with this form a I list of data requirements (the Data Matrix form must be			
SECTION II: GENERAL (OFFER TO PAY				
[Required if using the cite-all method or when using the cite-all option under the select I hereby offer and agree to pay compensation, to other persons, with regard to					
SECTION III: CERTI	FICATION				
I certify that this application for registration, this form for reregistration, or th application for registration, the form for reregistration, or the Data-Call-In response. In indicated in Section I, this application is supported by all data in the Agency's files that substantially similar product, or one or more of the ingredients in this product; and (2) is requirements in effect on the date of approval of this application if the application souguses .	addition, if the cite-a t (1) concern the pro s a type of data that	all option or cite-all option under the selective method is perties or effects of this product or an identical or would be required to be submitted under the data			
I certify that for each exclusive use study cited in support of this registration the written permission of the original data submitter to cite that study.	or reregistration, tha	at I am the original data submitter or that I have obtained			
I certify that for each study cited in support of this registration or reregistration that is not an exclusive use study, either: (a) I am the original data submitter; (b) I have obtained the permission of the original data submitter to use the study in support of this application; (c) all periods of eligibility for compensation have expired for the study; (d) the study is in the public literature; or (e) I have notified in writing the company that submitted the study and have offered (I) to pay compensation to the extent required by sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA; and (ii) to commence negotiations to determine the amount and terms of compensation, if any, to be paid for the use of the study.					
I certify that in all instances where an offer of compensation is required, copies of all offers to pay compensation and evidence of their delivery in accordance with sections 3(c)(1)(F) and/or 3(c)(2)(B) of FIFRA are available and will be submitted to the Agency upon request. Should I fail to produce such evidence to the Agency upon request, I understand that the Agency may initiate action to deny, cancel or suspend the registration of my product in conformity with FIFRA.					
I certify that the statements I have made on this form and all attachm knowingly false or misleading statement may be punishable by fine or impriso					
Signature Cauton	Date 12/17/2019	Typed or Printed Name and Title Crystal Layton, Regulatory Manager			



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address

Seria the form to this address.					
	DATA MA	ATRIX			
Date December 17, 2019			EPA Reg No./File Symbol 91813-1	13	Page 1 of 30
	siness Center, Suite 402		Product Permethrin Technical		
King of Prussia, P					
	No.: 52645-53-1; Chemical Code: 109701)	T	1	1 24 4	
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
PRODUCT SPECIFIC DATA RE	1				
830.1550	Product Identity and Composition	44841201 51024201	UPL NA Inc.	OWN	
830.1600	Description of Materials Used to Produce the Product	44841201 51024201	UPL NA Inc.	OWN	
830.1620	Description of the Production Process	44841201 51024201	UPL NA Inc.	OWN	
830.1650	Description of the Formulation Process				Not required ¹
830.1670	Discussion of Formation of Impurities	44841201 51024201	UPL NA Inc.	OWN	
830.1700	Preliminary Analysis	44841201 50127101	UPL NA Inc. UPL NA Inc.	OWN OWN	
		51024202			
830.1750	Certified Limits	44841201 51024201	UPL NA Inc.	OWN	
830.1800	Enforcement Analytical Method	44841201 51024202	UPL NA Inc.	OWN	
830.6302	Color	44841202	UPL NA Inc.	OWN	
830.6303	Physical State	44841202	UPL NA Inc.	OWN	
830.6304	Odor	44841201	UPL NA Inc.	OWN	
830.6313	Stability to Normal and Elevated Temperatures, Metals and Metal Ions	44841202	UPL NA Inc.	OWN	
Signature	100		Name and Title Crystal Layton		Date 1217/2019

Regulatory Manager



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address

send the form to this address.					
	DATA MA	ATRIX			
Date December 17, 2019			EPA Reg No./File Symbol 91813-1	3	Page 2 of 30
King of Prussia, P	iness Center, Suite 402 A 19406		Product Permethrin Technical		
Ingredient Permethrin (CAS	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.6314	Oxidation / Reduction: Chemical Incompatibility	44841202	UPL NA Inc.	OWN	
830.6315	Flammability	44841202	UPL NA Inc.	OWN	
830.6316	Explodability	44841202	UPL NA Inc.	OWN	
830.6317	Storage Stability	48881501	UPL NA Inc.	OWN	
830.6319	Miscibility	44841202	UPL NA Inc.	OWN	
830.6320	Corrosion Characteristics	48881501	UPL NA Inc.	OWN	
830.6321	Dielectric Breakdown Voltage				Not required ²
830.7000	pH	44841202	UPL NA Inc.	OWN	
830.7050	UV / Visible Absorption	44841202	UPL NA Inc.	OWN	
830.7100	Viscosity	44841202	UPL NA Inc.	OWN	
830.7200	Melting Point / Melting Range				Not required ³
830.7220	Boiling Point / Boiling Range	44841202	UPL NA Inc.	OWN	
830.7300	Density / Relative Density / Bulk Density	44841202	UPL NA Inc.	OWN	
830.7370	Dissociation Constants in Water				Not required ⁴
830.7520	Particle Size, Fiber Length, and Diameter Distribution				Not required
830.7550	Partition Coefficient (n-octanol/water), Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7560	Partition Coefficient (n-octanol/water), Generator Method				See 830.7550
830.7570	Partition Coefficient (n-octanol/water), Estimation by Liquid Chromatography				See 830.7550
830.7840	Water Solubility: Column Elution Method, Shake Flask Method	44841202	UPL NA Inc.	OWN	
830.7860	Water Solubility: Generator Column Method				See 830.7840
Signature	utan		Name and Title Crystal Layton Regulatory Manager		Date 1217/2019



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		DATA MATRIX			
Date December 17, 2019			EPA Reg No./File Symbol 91813-13		Page 3 of 30
Applicant's/Registrant's Name & A	Address		Product		•
UPL NA Inc.			Permethrin Technical		
630 Freedom Bus King of Prussia, P.	iness Center, Suite 402 A 19406				
Ingredient Permethrin (CAS	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
830.7950	Vapor Pressure	44841202	UPL NA Inc.	OWN	
870.1100	Acute Oral Toxicity – rat	00242899		OLD	See endnote ⁵
870.1200	Acute Dermal Toxicity – rat	00242899		OLD	See endnote ⁶
870.1300	Acute Inhalation Toxicity – rat	41031103		OLD	
870.2400	Eye Irritation	00242899		OLD	See endnote ⁷
870.2500	Skin Irritation	00242899		OLD	See endnote ⁸
870.2600	Skin Sensitization				Not required ⁹
PERMETHRIN GENERIC DATA	REQUIREMENTS				
850.2100	Acute Avian Oral Toxicity	41888401		OLD	See endnote ¹⁰
	,	49511902	Permethrin Data Group II Steering Committee/Joint Venture (PDGII)	OWN	
850.2200	Acute Avian Dietary Toxicity	41888402		OLD	See endnote ¹¹
		41888403		OLD	
850.2400	Wild Mammal Toxicity				Not required / See 870 series
850.2300	Avian Reproductive Toxicity	42322901		OLD	See endnote ¹²
		42322902		OLD	
850.2500	Simulated or Actual Field Testing				Not required

Signature	Name and Title	Date
Carto	Crystal Layton	1217/2019
Cominger	Regulatory Manager	



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

Date December 17, 2019

Applicant's/Registrant's Name & Address
UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number Guideline Study Name MRID Number Status Submitter Note 850.1075 Freshwater Fish Toxicity 00110663 OLD See endnote¹³ OLD 00110657 OWN 49540301 PDGII See endnote¹⁴ 850.1010 Freshwater Invertebrate Toxicity 00110662 OLD 00110663 OLD 850.1025. 850.1035. Acute Toxicity Estuarine and Marine Organisms 41874901 OLD See endnote¹⁵ 850.1045, 850.1055, 42584001 OI D 850.1075 43492902 OLD 49511901 PDG II OWN See endnote¹⁶ OLD 850.1300 Aquatic Invertebrate Life Cycle (Freshwater) 43745701 PDG II OWN See endnote¹⁷ 850.1350 Aguatic Invertebrate Life Cycle (Saltwater) 49554601 OLD See endnote¹⁸ 850.1400 Fish Early Life Stage (Freshwater) 00110666 Not required¹⁹ 850.1400 Fish Early Life Stage (Saltwater) 850.1500 Life Cycle Fish 00161436 OLD See endnote²⁰ 850.1710, 850.1730, Aquatic Organisms Bioavailability, Biomagnification, Toxicity 41300401 OLD See endnote²¹ 850.1850 41300402 OLD 41300403 OLD 850.1950 Simulated or Actual Field Testing for Aquatic Organisms Not required 850.1735 Whole Sediment: Acute Freshwater Invertebrates Not required 850.1740 Whole Sediment: Acute Marine Invertebrates Not required

Signature	Name and Title	Date
C_{2} $+\infty$	Crystal Layton	1217/2019
Cestugar	Regulatory Manager	



Paperwork Reduction Act Notice: The public reporting burden for this collection of information is estimated to average 0.25 hours per response for registration activities and 0.25 hours per response for registration and special review activities, including time for reading the instructions and completing the necessary forms. Send comments regarding the burden estimate or any other aspect of this collection of information, including suggestions for reducing the burden to: Director, OPPE Information Management Division (2137), U.S. Environmental Protection Agency, 401 M Street, S.W., Washington, DC 20460. Do not send the form to this address.

DATA MATRIX Date December 17, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701) Guideline Reference Number Guideline Study Name MRID Number Submitter DATA MATRIX EPA Reg No./File Symbol 91813-13 Page 5 of 30 Product Permethrin Technical Permethrin Technical MRID Number Submitter Status Note N/A Whole Sediment: Chronic Invertebrates Freshwater and 48788101 PDGII

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
N/A	Whole Sediment: Chronic Invertebrates Freshwater and	48788101	PDGII	OWN	See endnote ²²
	Marine	48788301	PDGII	OWN	
		49063101	PDGII	OWN	
850.3020	Honey Bee Acute Contact Toxicity	42674501		OLD	See endnote ²³
850.3030	Honeybee Toxicity of Residues on Foliage	42009301		OLD	See endnote ²⁴
850.3040	Field Testing for Pollinators				Reserved ²⁵
SS-1149	Aquatic Invertebrate Acute Toxicity	49513901	PDGII	OWN	
070 0400	B. IN The state of				No. 1
870.6100	Delayed Neurotoxicity (Acute) – Hen				Not required
870.6200	Acute Neurotoxicity – Rat	43046301		OLD	See endnote ²⁶
		45657401		OLD	
870.3100	90-Day Oral: Rodent	00025914		OLD	See endnote ²⁷
		00025915		OLD	
		00040491		OLD	
		00054737		OLD	
		00070577		OLD	
870.3150	90-Day Oral: Non-Rodent	00029832		OLD	See endnote ²⁸
		00043722		OLD	
		00070576		OLD	
		00071951		OLD	
870.3200	21/28-Day Dermal Toxicity	41143801		OLD	See endnote ²⁹
		42653301		OLD	

Signature	Name and Title	Date
C_{2}	Crystal Layton	1217/2019
Cestaga	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.3250	90-Day Dermal Toxicity				Not required ³⁰
870.3465	90-Day Inhalation Toxicity	00096713		OLD	See endnote ³¹
870.6100	28-Day Delayed Neurotoxicity – Hen				Not required
870.6200	90-Day Neurotoxicity	00071952		OLD	See endnote ³²
		40766807		OLD	
870.4100	Chronic Oral Rodent	00069701		OLD	See endnote ³³
		00120268		OLD	
870.4200	Carcinogenicity	00069701		OLD	See endnote ³⁴
		00069703		OLD	
		00069704		OLD	
		00102110		OLD	
		00120268		OLD	
		45597105		OLD	
870.3700	Reproduction / Developmental Toxicity Screening Test	40943602		OLD	See endnote ³⁵
		40943603		OLD	
870.3800	2-Generation Reproduction: Rat	00102108		OLD	See endnote ³⁶
		00120271		OLD	
870.6300	Developmental Neurotoxicity Study				Not required ³⁷
870.5100	Bacterial Reverse Mutation Test	41031107		OLD	See endnote ³⁸
870.5300, 870.5375	In vitro Mammalian Cell Assay				Not required
870.5385, 870.5395,	In vivo Cytogenetics and Other Effects	40943604		OLD	See endnote ³⁹
870.5450, 870.5550		42723302		OLD	

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C_{2}	Crystal Layton	1217/2019
Calagar	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
870.7485	Metabolism and Pharmacokinetics	00054719		OLD	See endnote ⁴⁰
		00054720		OLD	
		00065903		OLD	
		00089006		OLD	
		00102185		OLD	
870.7200	Companion Animal Safety				Not required / Formulation specific
870.7600	Dermal Penetration	43169001		OLD	See endnote ⁴¹
870.7800	Immunotoxicity				Not required ⁴²
875.1100	Dermal Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1200	Dermal Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1300	Inhalation Exposure – Outdoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1400	Inhalation Exposure – Indoor		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1500	Biological Monitoring		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1600	Data Reporting and Calculations		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.1700	Product Use Information		Agricultural Handler Exposure TF	OWN	See endnote ⁴³
875.2100	Dislodgeable Foliar Residue and Turf Transferable Residues	43755701		OLD	
		44955501		OLD	
875.2200	Soil Residue Dissipation		Agricultural Reentry TF	OWN	See endnote ⁴⁴
			Outdoor Residential Exposure TF	OWN	
Signature			Name and Title		Date
CQ_{α}	utan		Crystal Layton		1217/2019
	8		Regulatory Manager		



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	DA	ATA MATRIX			
Date December 17, 2019			EPA Reg No./File Symbol 91813-13		Page 8 of 30
Applicant's/Registrant's Name & UPL NA Inc. 630 Freedom Bus King of Prussia, P	siness Center, Suite 402		Product Permethrin Technical		
Ingredient Permethrin (CAS	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
875.2400	Dermal Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2500	Inhalation Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN	See endnote ⁴⁴
875.2600	Biological Monitoring		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2700	Product Use Information		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.2800	Descriptions of Human Activity		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN	See endnote ⁴⁴
875.2900	Data Reporting and Calculations		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
875.3000	Nondietary Ingestion Exposure		Agricultural Reentry TF Outdoor Residential Exposure TF	OWN OWN	See endnote ⁴⁴
201-1	Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
202-1	Droplet Size Spectrum Droplet Size Spectrum		Spray Drift TF	OWN	See endnote ⁴⁵
890.1100	Amphibian Metamorphosis (Rat)	48988601	PDGII	OWN	See endnote ⁴⁶
890.1150	Androgen Receptor Binding (Rat Prostate)				Not applicable / See endnote ⁴⁷
890.1200	Aromatase (Human Recombinant)	48618601	PDGII	OWN	See endnote ⁴⁸
Signature	utan		Name and Title Crystal Layton Regulatory Manager		Date 1217/2019



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
890.1250	Estrogen Receptor Binding				Not applicable / See endnote ⁴⁷
890.1300	Estrogen Receptor Transcriptional Activation Assay				Not applicable / See endnote ⁴⁷
890.1350	Fish Short-Term Reproduction	48702301	PDGII	OWN	See endnote ⁴⁹
890.1400	Hershberger (Rat)	48618602	PDGII	OWN	See endnote ⁵⁰
890.1450	Female Pubertal (Rat)	48672901	PDGII	OWN	See endnote ⁵¹
890.1500	Male Pubertal (Rat)	48687101	PDGII	OWN	See endnote ⁵²
890.1550	Steroidogenesis	48618603	PDGII	OWN	See endnote ⁵³
890.1600	Uterotrophic (Rat)				Not applicable / See endnote ⁴⁷
850.4100	Tier 1: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 1: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵
850.4400, 850.4500	Tier 1: Aquatic Plant Growth	49398801	PDGII	OWN	See endnote ⁵⁶
		49398803	PDGII	OWN	
		49398804	PDGII	OWN	
		49398805	PDGII	OWN	
850.4100	Tier 2: Seedling Emergence	49475301	PDGII	OWN	See endnote ⁵⁴
850.4150	Tier 2: Vegetative Vigor	49475302	PDGII	OWN	See endnote ⁵⁵

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C_{2} c_{2}	Crystal Layton	1217/2019
Cestinger	Regulatory Manager	



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		DATA MATRIX			
Date December 17, 2019			EPA Reg No./File Symbol 9181	3-13	Page 10 of 30
Applicant's/Registrant's Name & UPL NA Inc. 630 Freedom Bus King of Prussia, F	siness Center, Suite 402		Product Permethrin Technic	al	
Ingredient Permethrin (CAS	No.: 52645-53-1; Chemical Code: 109701)				
Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
850.4400, 850.4500	Tier 2: Aquatic Plant Growth	49398801	PDGII	OWN	See endnote ⁵⁶
		49398803	PDGII	OWN	
		49398804	PDGII	OWN	
		49398805	PDGII	OWN	
850.4300	Terrestrial Field				Not required
850.4450	Aquatic Field				Not required
850.4025	Target Area Phytotoxicity				Not required
850.4550	Cyanobacteria Toxicity	49398802	PDGII	OWN	See endnote ⁵⁷
835.2120	Hydrolysis	00102043			See endnote ⁵⁸
835.2240	Photodegradation in Water	40242801		OLD	See endnote ⁵⁹
		49542801	PDGII	OWN	
835.2410	Photodegradation in Soil	40190101		OLD	See endnote ⁶⁰
835.2370	Photodegradation in Air				Not required
835.4100	Aerobic Soil Metabolism	42410002		OLD	See endnote ⁶¹
		49622001	PDGII	OWN	
835.4200	Anaerobic Soil Metabolism	41970601		OLD	See endnote ⁶²
		49728101	PDGII	OWN	
835.4300	Aerobic Aquatic Metabolism	43938201		OLD	See endnote ⁶³
	· ·	49624902	PDGII	OWN	
835.4400	Anaerobic Aquatic Metabolism	43982001		OLD	See endnote ⁶⁴
		49624903	PDGII	OWN	
Signature	utan		Name and Title Crystal Layton Regulatory Manager		Date 1217/2019



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
835.1230	Leaching / Adsorption / Desorption	41868001		OLD	See endnote ⁶⁵
		43424901		OLD	
		45170102		OLD	
		49624901	PDGII	OWN	
835.1410	Volatility – Laboratory				Not required
835.8100	Volatility – Field				Not required
835.6100	Soil Field Dissipation Study	42359101		OLD	
835.6200	Aquatic Sediment Field Dissipation Study	44030501		OLD	
		44157101		OLD	
835.6300	Forest Field Dissipation Study				Not required
835.6400	Combination and Tank Mixes				Not required
835.7100	Ground Water Monitoring				Not required
850.6100	Environmental Chemistry Methods	49263701	PDGII	OWN	
		49421001	PDGII	OWN	
SS-1099	Leachability from Treated Wood	49638201	PDGII	OWN	
		49638202	PDGII	OWN	
SS-1065	POTW Treatability Study	48762906	Pyrethroid Working Group	PER	

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C_{2} $+\infty$	Crystal Layton	1217/2019
Ceangar	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1300	Nature of the Residue: Plants	00025919		OLD	
		00025920		OLD	
		00094393		OLD	
		00094394		OLD	
		43307801		OLD	
860.1300	Nature of the Residue: Livestock	42196702-03		OLD	
		42410001		OLD	
		42503201		OLD	
		43458801-02		OLD	
		43505201		OLD	
		43713301-04		OLD	
		43962801		OLD	
		44196101-02		OLD	
		44417803		OLD	
860.1850	Confined Rotational Crops	43174401		OLD	

Signature	Name and Title	Date
Carto	Crystal Layton	1217/2019
Course	Regulatory Manager	



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Date December 17, 2019 EPA Reg No./File Symbol 91813-13 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number Guideline Study Name MRID Number Status Submitter Note 860.1340 Residue Analytical Methods 00043877 OLD OLD 00054724 OLD 00064675 OLD 00064678 00070916 OLD 00072582 OLD 00160394 OLD 40404002 OLD 40446403-04 OLD 40556804 OLD 41641001 OI D 42137202 OLD 43364705 OLD 43962801 OLD 44196103 OLD 44417801-02 OLD 44428204 OLD OLD 860.1360 Multiresidue Method 00070914

Signature	Name and Title	Date
Carton	Crystal Layton	1217/2019
Comment	Regulatory Manager	



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Guideline Reference Number Guideline Study Name MRID Number Status Submitter Note 860.1380 Storage Stability 00102107 OLD OLD 00110622 OLD 00137902 OLD 00165525 41560202 OLD 42919201 OI D 43494701 OLD 43505201 OLD 44135001 OLD 48598605 PDGII OWN 48598606 **PDGII** OWN 860.1500 00025992 OLD Magnitude of the Residue in Plants: alfalfa (including grown for seed) 00026551-52 OLD 00047632 OLD 00047634-35 OLD 00151832 OLD 40072401 OLD 42909001 OI D 43343101 OLD 860.1500 Magnitude of the Residue in Plants: almond 00100520 OLD OLD 00110564 42322903 OLD 43938801 OI D Signature Name and Title Date

Crystal Layton

Regulatory Manager

1217/2019



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: artichoke	00145266		OLD	
		42137201		OLD	
860.1500	Magnitude of the Residue in Plants: asparagus	40446401-02		OLD	
860.1500	Magnitude of the Residue in Plants: avocado	00144307		OLD	
		41565401		OLD	
		44229501		OLD	
860.1500	Magnitude of the Residue in Plants: broccoli	00034774		OLD	
		00034778		OLD	
		00080054		OLD	
		41065802		OLD	
		43903501		OLD	
860.1500	Magnitude of the Residue in Plants: Brussels sprouts	00034775		OLD	
		00080054		OLD	
860.1500	Magnitude of the Residue in Plants: cabbage	00034779		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00110693		OLD	
		00156265		OLD	
		41065802		OLD	
		48598601	PDGII	OWN	

Signature	Name and Title	Date
Carto	Crystal Layton	1217/2019
Country	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: cavallo broccolo	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	
860.1500	Magnitude of the Residue in Plants: cauliflower	00034776		OLD	
		00080054		OLD	
		41065802		OLD	
860.1500	Magnitude of the Residue in Plants: cherry	41065803		OLD	
		44135001		OLD	

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C_{2}	Crystal Layton	1217/2019
Cestugar	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: Chinese broccoli	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	
860.1500	Magnitude of the Residue in Plants: Chinese cabbage	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	
		48598601	PDGII	OWN	
Signature	Signature		Name and Title		Date
C_{2n}	ytan		Crystal Layton		1217/2019
	8-1		Regulatory Manager		



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: collards	00150293		OLD	
		00155947		OLD	
		41575901		OLD	
		48639202	PDGII	OWN	
860.1500	Magnitude of the Residue in Plants: corn (field, pop, sweet,	00034777-78		OLD	
	grown for seed)	00069651-52		OLD	
		00088973		OLD	
		41052402		OLD	
		41065804		OLD	
		43149501		OLD	
		43350503		OLD	
		43364701-02		OLD	
860.1500	Magnitude of the Residue in Plants: cucurbit vegetables, crop	00126691		OLD	
	group 9	00151251		OLD	
		00155167		OLD	
		40556801-03		OLD	
		41565402		OLD	
		41565405		OLD	
		44182701-02		OLD	
860.1500	Magnitude of the Residue in Plants: eggplant	00129296		OLD	
		41565403		OLD	
860.1500	Magnitude of the Residue in Plants: filbert (hazelnut)	00142263		OLD	

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Carton	Crystal Layton	1217/2019
Cestilyer	Regulatory Manager	



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DATA MATRIX

Date December 17, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

DATA MATRIX

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Product
Permethrin Technical

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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: garlic	40404001		OLD	
860.1500	Magnitude of the Residue in Plants: horseradish	00094610		OLD	
		41565404		OLD	
860.1500	Magnitude of the Residue in Plants: kiwifruit	00072579-80		OLD	
		00072585		OLD	
860.1500	Magnitude of the Residue in Plants: kohlrabi	00034774		OLD	
		00034778-89		OLD	
		00080054-55		OLD	
		00080057-58		OLD	
		00105293		OLD	
		00110693		OLD	
		00155947		OLD	
		00156265		OLD	
		41065802		OLD	
		41575901		OLD	
		43903501		OLD	

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Caracyca	Regulatory Manager	



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DATA MATRIX Date December 17, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 DATA MATRIX EPA Reg No./File Symbol 91813-13 Page 20 of 30 Product Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: leafy vegetables (except	00025921		OLD	
	brassica vegetables), crop group 4	00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	
860.1500	Magnitude of the Residue in Plants: mushrooms	00165524		OLD	
860.1500	Magnitude of the Residue in Plants: nectarines	00118504		OLD	
		43348101		OLD	
860.1500	Magnitude of the Residue in Plants: onion	40404001		OLD	
860.1500	Magnitude of the Residue in Plants: papaya	00144307		OLD	
		41565401		OLD	
		44453101		OLD	
Signature			Name and Title		Date
C Dau	ytan		Crystal Layton Regulatory Manager		1217/2019



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DATA MATRIX Date December 17, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 DATA MATRIX EPA Reg No./File Symbol 91813-13 Page 21 of 30 Permethrin Technical Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: parsley	00025921		OLD	
		00034780-81		OLD	
		00081628		OLD	
		00102082		OLD	
		00110622		OLD	
		00139530		OLD	
		00140140		OLD	
		00150293		OLD	
		00155947		OLD	
		00156265		OLD	
		41065808		OLD	
		41575901		OLD	
		42322904		OLD	
		42431401		OLD	
		42979901		OLD	
		43350501-02		OLD	
860.1500	Magnitude of the Residue in Plants: peach	00118504		OLD	
		43348101		OLD	
860.1500	Magnitude of the Residue in Plants: peppers (bell)	00129296		OLD	
		41565403		OLD	
		43494701		OLD	
		43498101		OLD	

Signature	Name and Title	Date
Carto	Crystal Layton	1217/2019
Cominger	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: pistachio	00133293		OLD	
		41065805		OLD	
		41641002		OLD	
860.1500	Magnitude of the Residue in Plants: pome fruits, crop group	00042620-21		OLD	
	11	00083972		OLD	
		42322905		OLD	
		42838101		OLD	
860.1500	Magnitude of the Residue in Plants: potato	00025985-86		OLD	
		00081578-79		OLD	
		43343102		OLD	
		44162601		OLD	
860.1500	Magnitude of the Residue in Plants: range grasses	00128728		OLD	
		41565406		OLD	
		48598603	PDGII	OWN	

Signature	Name and Title	Date
C_{2} $+\infty$	Crystal Layton	1217/2019
Cestugar	Regulatory Manager	



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Date December 17, 2019 Applicant's/Registrant's Name & Address UPL NA Inc. 630 Freedom Business Center, Suite 402 King of Prussia, PA 19406 Ingredient Permethrin (CAS No.: 52645-53-1; Chemical Code: 109701)

Guideline Reference Number Guideline Study Name MRID Number Status Submitter Note 860.1500 Magnitude of the Residue in Plants: roquette (arugula) 00025921 OLD 00034780-81 OLD OLD 00081628 OLD 00102082 00110622 OLD 00139530 OLD 00140140 OLD 00150293 OLD 00155947 OLD 00156265 OLD 41065808 OI D 41575901 OLD OLD 42322904 42431401 OLD 42979901 OLD OLD 43350501-02

Signature	Name and Title	Date
C_{2} $+\infty$	Crystal Layton	1217/2019
Ceangar	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: soybeans	00026542		OLD	
		00026548		OLD	
		00057091		OLD	
		00110622		OLD	
		00135413		OLD	
		00137902		OLD	
		00144855		OLD	
		00155947		OLD	
		00165525		OLD	
		43364704		OLD	
860.1500	Magnitude of the Residue in Plants: spinach	00150293		OLD	
		41065808		OLD	
		42431401		OLD	
		42979901		OLD	
		43350502		OLD	
860.1500	Magnitude of the Residue in Plants: tomatillos	00026543		OLD	
		00026546		OLD	
		00034785		OLD	
		00110622		OLD	
		00140140		OLD	
		41404301		OLD	
		42322903		OLD	

Signature	Name and Title	Date
Caruta	Crystal Layton	1217/2019
Caracian	Regulatory Manager	



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Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1500	Magnitude of the Residue in Plants: tomato	00026543		OLD	
		00026546		OLD	
		00034785		OLD	
		00110622		OLD	
		00140140		OLD	
		41404301		OLD	
		42322903		OLD	
860.1500	Magnitude of the Residue in Plants: turnips	00155947		OLD	
		41575901		OLD	
860.1500	Magnitude of the Residue in Plants: walnut	00072833		OLD	
		42322906		OLD	
860.1500	Magnitude of the Residue in Plants: watercress	00145971		OLD	
		00157481		OLD	
		41565407		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: corn	42860601		OLD	
		42910101		OLD	
		43374601		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: apple	42824702		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: potato	42824701		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed:	00070912		OLD	
	soybeans	43364703		OLD	
860.1520	Magnitude of the Residue in Processed Food or Feed: tomato	41404301		OLD	
Signature			Name and Title		Date
Caa	ytan		Crystal Layton Regulatory Manager		1217/2019



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DATA MATRIX

Date December 17, 2019

Applicant's/Registrant's Name & Address

UPL NA Inc.
630 Freedom Business Center, Suite 402
King of Prussia, PA 19406

DATA MATRIX

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Product
Permethrin Technical

Guideline Reference Number	Guideline Study Name	MRID Number	Submitter	Status	Note
860.1480	Magnitude of the Residue in Meat, Milk, Poultry, and Eggs	00054723		OLD	
		00064674		OLD	
		00064676		OLD	
		00064679-80		OLD	
		00064682-86		OLD	
		00070914-15		OLD	
		00070917		OLD	
		00079385-87		OLD	
		00110624		OLD	
		41560201		OLD	
860.1400	Nature and Magnitude of the Residue in Potable Water				Not required
860.1400	Magnitude of the Residue in Fish				Not required
860.1400	Magnitude of the Residue in Plants Resulting from the Use of Irrigation Water				Not required
860.1460	Magnitude of the Residue in Food Handling Establishments				Not required
860.1900	Field Rotational Crops	44428201-03		OLD	

Signature	Name and Title	Date
$C \circ \circ$	Crystal Layton	1217/2019
Cestugar	Regulatory Manager	

Data Matrix Endnotes for Permethrin Technical

- **830.1650** These data are not required for registration of a technical grade active ingredient. Refer to guideline 830.1620.
- ² **830.6321 –** Product is not used around electrical equipment.
- ³ **830.7200 –** Product is a liquid.
- ⁴ **830.7370 –** No significant acidic or basic moieties
- 5 870.1100 The study cited is acceptable and satisfies the data requirement as per the Jun. 30, 2017 Permethrin: Human Health Draft Risk Assessment for Registration Review (DP Barcode: D414137) (Human Health Risk Assessment).
- 870.1200 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁷ 870.2400 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- 8 870.2500 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁹ **870.2600 –** The Permethrin RED stated that these data are not required.
- 850.2100 The study cited is acceptable and satisfies the data requirement as per the June 20, 2011 EFED Registration Review Preliminary Problem Formulation for Permethrin (DP Barcode: D384703) (Problem Formulation) and the RED. Passerine data were required as per the Dec. 12, 2012 Permethrin Generic Data Call-In (GDCI-109701-1252) (2012 GDCI). These data were submitted under MRID No. 49511902.
- ¹¹ **850.2200 –** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹² **850.2300** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation.
- ¹³ **850.1075** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the Sept. 30, 2016 *Preliminary Comparative Environmental Fate and Ecological Risk Assessment for the Registration Review of Eight Synthetic Pyrethroids and the Pyrethrins* (DP Barcodes: D425791, D429461, D433338, D433339, D435888) (EFED Risk Assessment).
- ¹⁴ **850.1010 –** The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 850.1025, 850.1035, 850.1045, 850.1055, 850.1075 The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation or the EFED Risk Assessment. MRID No. 42584001 is also cited. Additional data were required as per the 2012 GDCI and were submitted under MRID No. 49511901.
- 850.1300 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 850.1350 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- ¹⁸ **850.1400 –** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 19 850.1400 These data are not required as per the Problem Formulation and the EFED Risk Assessment.
- ²⁰ **850.1500** The study cited is acceptable and satisfies the data requirement as per the Problem Formulation.

Data Matrix Endnotes for Permethrin Technical

- 850.1710, 850.1730, 850.1850 The studies cited are acceptable and satisfy the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 22 N/A The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- 23 850.3020 The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 850.3030 The study cited is acceptable and satisfies the data requirement as per the Problem Formulation and the EFED Risk Assessment.
- 850.3040 As per the Problem Formulation, these data are reserved pending the requirement for a refined pollinator risk assessment.
- 870.6200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3100 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3150 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment. Note: an invalid MRID was referenced in the Human
- 30 870.3250 These data are not required as per the Human Health Risk Assessment.
- 870.3465 The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- 870.6200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.4100 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.4200 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3700 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- 870.3800 The studies cited are acceptable and satisfy the data requirement as per the Human Health Risk Assessment.
- ³⁷ **870.6300** These data are not required as per the Human Health Risk Assessment.
- 870.5100 The study cited is acceptable and satisfies the data requirement as per the RED and the June 15, 2011 Permethrin: Registration Review Scoping Document for Human Health Assessments (DP Barcode: D384702) (Scoping Document). The MRID referenced in the Human Health Risk Assessment appears to be an error.
- ³⁹ **870.5385, 870.5395, 870.5450, 870.5550** The studies cited are acceptable and satisfy the data requirement as per the RED and the Scoping Document. The MRID Nos. referenced in the Human Health Risk Assessment appear to be in error.
- ⁴⁰ **870.7485** The studies cited are acceptable and satisfy the data requirement as per the RED or the Human Health Scoping Document. MRID Nos. 00065903 and 00102185 are also cited.
- ⁴¹ **870.7600** The study cited is acceptable and satisfies the data requirement as per the Human Health Risk Assessment.
- ⁴² **870.7800 –** These data are not required as per the Human Health Risk Assessment.

- ⁴³ **875.1100**, **875.1200**, **875.1300**, **875.1400**, **875.1500**, **875.1600**, **875.1700** UPL NA Inc. is a member is good standing of the Agricultural Handler Exposure Task Force (AHETF).
- ⁴⁴ 875.2200, 875.2300, 875.2400, 875.2500, 875.2600, 875.2700, 875.2800, 875.2900, 875.3000 UPL NA Inc. is a member is good standing of the Agricultural Reentry Task Force (ARTF) and the Outdoor Residential Exposure Task Force (ORETF).
- ⁴⁵ **201-1, 202-1 –** UPL NA Inc. is a member is good standing of the Spray Drift Task Force (SDTF).
- 46 890.1100 The study cited is acceptable and satisfies the data requirement as per the June 29, 2015 EPA Memorandum *Permethrin: Data Evaluation Records (DERs) for EDSP Tier 1 Assays* (DP Barcodes: D398301, D401793, D405670) (EDSP DERs).
- ⁴⁷ **890.1150**, **890.1250**, **890.1300**, **890.1600** As per the EDSP DERs, this data requirement is not applicable, and the requirement has been satisfied by other scientifically relevant information (OSRI).
- ⁴⁸ **890.1200 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁴⁹ **890.1350** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵⁰ **890.1400 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵¹ **890.1450 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵² **890.1500** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- ⁵³ **890.15500 –** The study cited is acceptable and satisfies the data requirement as per the EDSP DERs.
- 850.4100 These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- 850.4150 These data were required as per the 2012 GDCI. The study cited was submitted to satisfy the data gap.
- 850.4400, 850.4500 The studies cited are acceptable and satisfy the data requirement as per the EFED Risk Assessment.
- ⁵⁷ **850.4550 –** The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 835.2120 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 835.2240 The study cited is supplemental and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49542801.
- 835.2410 The study cited is acceptable and satisfies the data requirement as per the EFED Risk Assessment.
- 835.4100 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49622001.
- 835.4200 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49728101.
- 835.4300 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624902.
- 835.4400 The study cited partially satisfies the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624903.

Data Matrix Endnotes for Permethrin Technical

835.1230 – The studies cited partially satisfy the data requirement as per the Problem Formulation and additional data were required as per the 2012 GDCI. These data were submitted under MRID No. 49624901.

Commercial/financial information may be entitled to confidential treatment

From: notification@pay.gov

To: <u>Crystal Layton/Regulatory/Lake Park</u>

Subject: External :Pay.gov Payment Confirmation: PRIA Service Fees

Date: Tuesday, December 17, 2019 11:44:54 AM

An official email of the United States government

Pay.gov logo



Your payment has been submitted to the designated government agency through Pay.gov and the details are below. Please note that this is just a confirmation of transaction submission. To confirm that the payment processed as expected, you may refer to your bank statement on the scheduled payment date. If you have any questions or wish to cancel this payment, you will need to contact the agency you paid at your earliest convenience.

Application Name: PRIA Service Fees Pay.gov Tracking ID: 26M7P47S Agency Tracking ID: 75908301645

Account Holder Name: UPL NA Inc. Transaction Type: ACH Debit Transaction Amount: \$13,888.00 Payment Date: 12/18/2019

Account Type: Business Checking

Routing Number:

Account Number: *********2762

Transaction Date: 12/17/2019 11:44:46 AM EST

Total Payments Scheduled: 1

Frequency: OneTime

Registration Number: 91813-13 Company Name: UPL Delaware, Inc.

Company Number: 91813

Action Code: R351

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